



COAKLEY O'NEILL
town planning

CREAMFIELDS

Planning Report and Statement of Consistency

The former CMP Dairy site (known as Creamfields) on
Tramore Road/Kinsale Road, Cork

Prepared in February 2022 on behalf of

Watfore Limited

Coakley O'Neill Town Planning Ltd.

 NSC Campus, Mahon, Cork


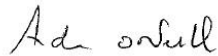

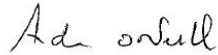
 021 2307000

 info@coakleyoneill.ie

 www.coakleyoneill.ie

Document Control Sheet

Client	Watfore Limited
Project Title	Creamfields SHD
Job No.	CON20051
Document Title	Planning Report and Statement of Consistency
Number of Pages	117

Revision	Status	Date of Issue	Authored	Checked	Signed
1	Draft	16 th February 2022	ND	AON	 
2	Final	22 nd February 2022	ND	AON	 

Confidentiality Statement

This report has been produced for the exclusive use of the commissioning party and unless otherwise agreed in writing by Coakley O'Neill Town Planning Ltd., no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by Coakley O'Neill Town Planning Ltd. for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report are on the basis of Coakley O'Neill using due skill, care and diligence in the preparation of same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to Coakley O'Neill Town Planning Ltd. has been made.

Maps reproduced under Ordnance Survey Ireland Licence Number CYAL50188676.

Contents

1.0	Introduction.....	4
2.0	Site Description and Context.....	4
3.0	Planning History.....	13
3.1	Planning History of the Subject Site.....	13
3.2	Relevant Planning History in the Vicinity of the Site.....	13
3.3	Relevant Planning History in wider Cork City area.....	18
3.4	Summary.....	25
4.0	Section 247 Pre-Application Consultations.....	28
5.0	Proposed Development.....	33
5.1	Vision.....	33
5.2	Description.....	34
5.3	Services.....	41
5.4	Mechanical and Electrical Building Services.....	43
5.5	Landscape Design.....	44
6.0	Consistency with National and Regional Planning Policy.....	46
6.1	Climate Change.....	46
6.2	COVID-19.....	47
6.3	Project Ireland 2040 – National Planning Framework (NPF) (2018).....	47
6.4	Regional Spatial and Economic Strategy for the Southern Region (2020).....	50
6.5	Cork Metropolitan Area Strategic Plan.....	56
6.6	Cork Metropolitan Area Transport Strategy 2040 (2020).....	60
6.7	Cork Cycle Network Plan (2017).....	62
6.8	Climate Action Plan 2021.....	63
6.9	Urban Development and Building Height Guidelines (2018).....	64
6.10	Housing For All (2021).....	73
6.11	Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).....	73
6.12	Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).....	76
6.13	Urban Design Manual – A Best Practice Guide.....	78
6.14	Design Manual for Urban Roads and Streets (2019).....	84
6.15	Guidelines for Planning Authorities on Childcare Facilities (2001).....	85
6.16	Smarter Travel – A New Transport Policy for Ireland 2009-2020.....	86
6.17	The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).....	86
6.18	Birds and Habitats Directives – Appropriate Assessment.....	87
6.19	Summary.....	88
7.0	Consistency with Local Planning Policy.....	89
7.1	Cork City Development Plan 2015-2021.....	89
7.2	Draft Cork City Development Plan 2022-2028.....	99
7.3	Summary.....	116
8.0	Conclusion.....	117
	Appendix A: Cork City Council Minutes of Section 247 Pre-Application Consultation held on 21/04/2021	
	Appendix B: Cork City Council Second S.247 Pre-Application Consultation feedback via email, 02/07/2021	
	Appendix C: An Bord Pleanála Record of the Section 247 Pre-Application Consultation held on 07/10/2021	

1.0 Introduction

We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, have been instructed by Watfore Limited (the fully owned property subsidiary company of Dairygold Co-operative Society Ltd.) to prepare this Planning Report & Statement of Consistency to accompany a planning application for a Strategic Housing Development (SHD), as enacted under the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended), at the former CMP Dairy site (known as Creamfields) on Tramore Road/Kinsale Road, Cork.

This Planning Report & Statement of Consistency sets out how, in our opinion, the proposed scheme complies with the proper planning and sustainable development of this area in the context of the relevant national strategic and local planning policy.

2.0 Site Description and Context

As illustrated in Figures 2 and 3 below, the overall site of the proposed development is a 3.39ha south-facing brownfield site with an elongated north-south orientation, which lies mid-way between Cork Airport and Cork City Centre. The site is located in the south-central suburbs of Cork City and is well connected to the entire south of the city via all modes of transport.

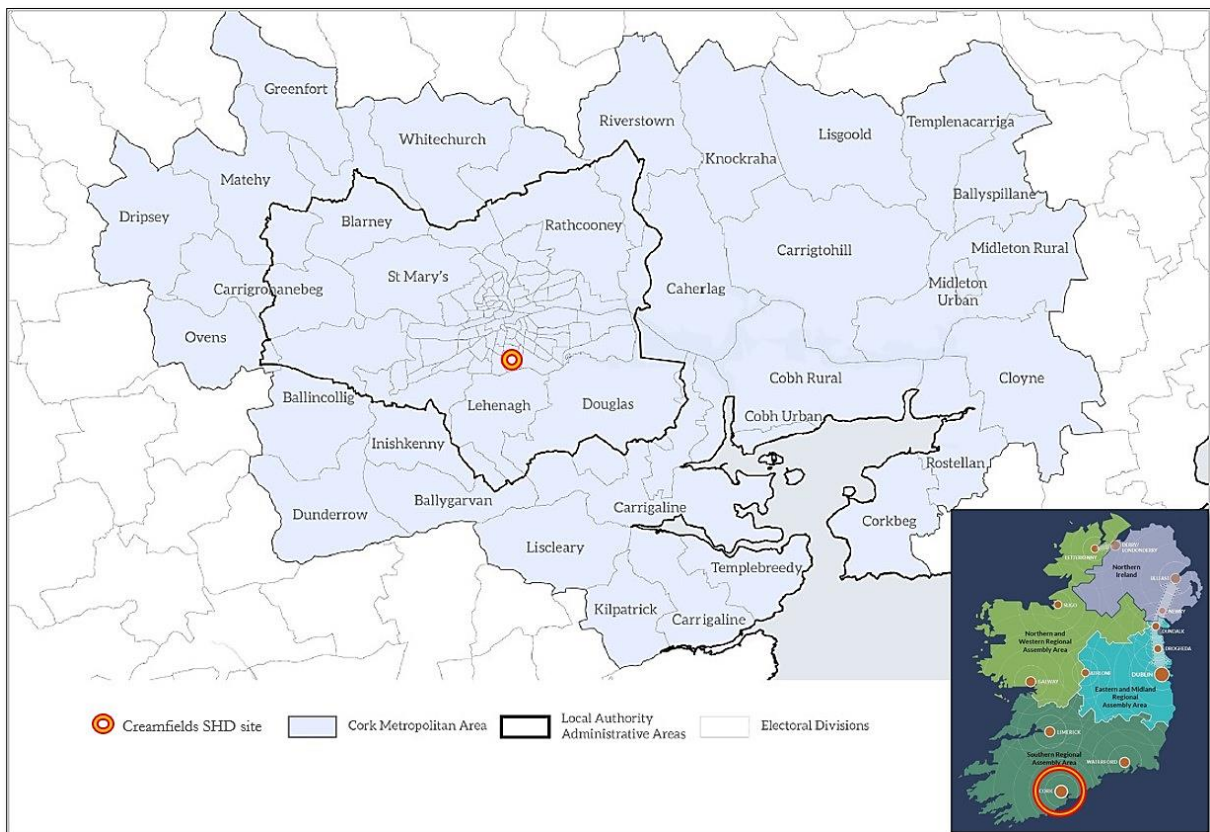


Figure 1. National and regional strategic context map regarding location of proposed SHD within Metropolitan Cork. (Base map source: Cork MASP – Southern Regional Spatial and Economic Strategy (2020). Insert source – Project Ireland 2040: National Planning Framework (2018). Annotated by Coakley O'Neill Town Planning Ltd., 2021).

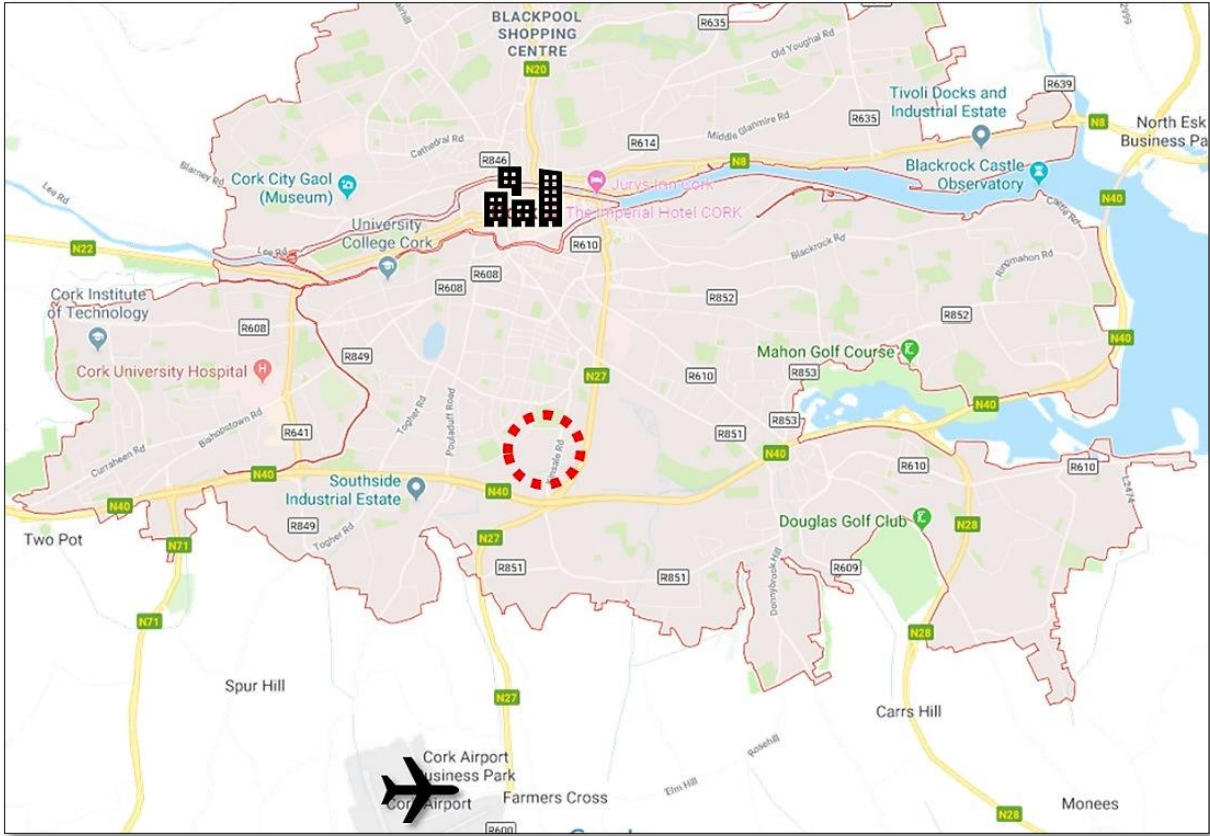


Figure 2. Strategic site location map - site location indicated by red circle. (Base map source: Google Maps; Annotated by Coakley O'Neill Town Planning Ltd., 2021)

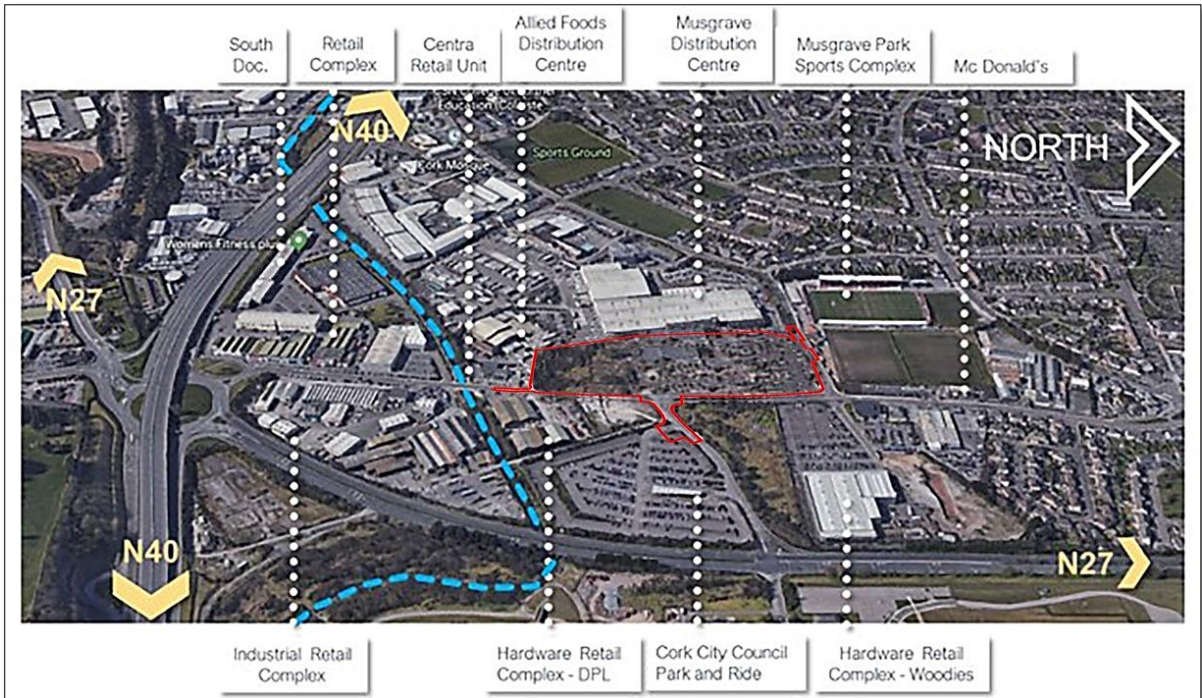


Figure 3. Aerial image of site showing local strategic context; indicative site boundary outlined in red. (Credit: Reddy Architecture and Urbanism, 2022).

The site of the proposed SHD is c. 3.39ha in area and is bounded to the north by Tramore Road (and faced by the Musgrave Park sports complex), to the east by Kinsale Road – a generous urban highway that forms a vital connection between the city and South Cork – and to the south and west by a convenience retail store and two large warehousing logistics complexes belonging to the Musgrave Group and Allied Foods. The northern section (60%) of the site is level, while the southern section gently slopes away towards the Tramore River, which is located further to the south of the adjacent convenience retail store. The T-junction formed by Kinsale Road and Mick Barry Road along the eastern boundary of the site corresponds with the contour line that results in the change in gradient on the subject site itself.



Figure 4. View of the entrance to the site from the north-west.

The current condition of the site can be described as typical brownfield – the site is predominantly characterised by aged hardstanding, which includes the remnants of building foundations, as well as rubble, gravel, shrubbery, semi-mature and some mature trees and mature hedging growing along the boundaries of the site. Japanese Knotweed is present in the southern half of the site. An overhead 38 kV electricity power line traverses the southern section of the site in a south-westerly/north-easterly direction. The current boundary treatment along Kinsale Road and Tramore Road is Guardsman security fencing on top of a single block-high capped wall with a line of Lawson Cypress trees, with palisade fencing along the site boundary with Musgraves. Between 1995 and 2006 the site was occupied by creamery buildings associated with the operations of Cork Milk Producers (CMP). In 2006 all buildings on site were demolished. Since then, the site has been an unoccupied brownfield site, with no other use than as the seasonal location for a temporary fun fair (Funderland).

The site occupies a strategic location, being within 500m of the Kinsale Road Roundabout which is the junction between the South Link Road (N27) – a dual carriageway which serves as a main arterial route, channelling significant volumes of traffic to/from and through Cork City Centre – and the South Ring Road (N40), which marks



Figure 5. View of the site from the north-east at the junction between Kinsale Road (left middleground) and Tramore Road (right middleground).

the southern boundary between the inner and outer southern suburbs of Cork City. The site is roughly equidistant from the following strategic centres of social, cultural and economic activity: Cork City Centre; University College Cork; the Airport Business Park; and Douglas. Furthermore, it is also centrally located relative to the following key Metropolitan Cork employment nodes: Mahon Point; Wilton; Bishopstown; Cork University Hospital, and; Munster Technological University Cork (formerly Cork Institute of Technology).

The wider surrounding site context is characterised by a large variety and mixture of footprints, from well-established residential suburban housing to box retail, sports and recreational open space, warehousing, and public transport facilities. The urban grain of the box retail, as well as the Black Ash Park and Ride public transport facility which connects the area by bus with the City Centre, and warehousing units, which lie to the east and south of the site, can be described as monolithic buildings surrounded by large open-air car parks and other underutilised land. The movement between these zones/buildings is predominantly by car, which leads to little or no pedestrian movement or civic engagement. In contrast to this, the three residential areas to the north-west and north-east – Ballyphehane, Turner’s Cross and the South Douglas Road – are long-established suburban neighbourhoods dating from the early and mid-twentieth century, where the open space and civic and communal buildings create and support a high degree of pedestrian permeability and support the realisation of a sense of community. To the south lies the residential area of Park Gate, as well as the industrial and business area of Togher. Immediately north of the site lies Musgrave Park rugby football stadium primarily used by two local rugby clubs and Munster Rugby. Further to the north is Turner’s Cross (Cork City FC) soccer stadium. Tramore Valley Park, a large recently opened regional public park within the Cork Metropolitan area, is located approximately 300m east of the site.



Figure 6. Internal view of the site looking south.



Figure 7. Internal view of the site looking north.



Figure 8. Internal view of the site looking south-east from inside the site entrance on Tramore Road.



Figure 9. Internal view of the southern section of site, looking east.



Figure 10. Internal view of the northern section of the site, looking west.



Figure 11. Internal view of the southern section of the site, looking west.



Figure 12. View of the site and Kinsale Road from the south-east. Semi-mature trees and fencing in the middleground indicate the southern boundary of the site.



Figure 13. View from the north-eastern boundary of the site (left) looking towards Cork City Centre. Two iconic buildings are visible from this point – the Elysian, Cork City Centre and Church of Christ the King, Turner's Cross (both left middleground). The view of the latter is protected view OC9 (of the Cork City Development Plan 2015-2021) which starts at the brow of the hill shown in the photograph.

Watfore Limited's reasons for advancing the proposed development on this site are as follows:

- **Its advantageous location in terms of local, regional, national and international connectivity whilst also being positioned at a key gateway to Cork City on approach from the south, within walking distance of high-quality public amenities, facilities and services, and within easy access of Cork City Centre;**
- **The opportunity it presents to entirely reinvigorate and bring back into use a large, single-ownership, vacant, underutilised brownfield site within the existing footprint of Cork City that is in a focal point location – in terms of its elevation on the rise and crest of a hill as well as its location at the junction of two key routes (Kinsale Road and Tramore Road) – in order to deliver a transformative, high-density, mixed-use, primarily residential development at a key entrance to Cork City that can serve as a flagship project to stimulate the regeneration of the surrounding area (an area which has been specifically identified as a location for future development in the city) and that will enable national growth targets and urban consolidation strategies to ensure Cork realises its potential as a city of scale;**
- **The significant potential it provides to deliver a distinctive, contemporary, compact new inner-suburban neighbourhood defined by a landmark tall building that will make a positive contribution to the urban character of the area as well as to the city as a whole, unconstrained as it is by important views or vistas, or on residential uses in the vicinity;**
- **The site's redevelopment will also greatly support the case for investment in the short-term in the BusConnects core radial bus network, a scheme identified as a priority in the *Cork Metropolitan Area Transport Strategy 2040*, as well as in general public realm improvements in the surrounding area in terms of cycling and pedestrian infrastructure, which will give rise to greater permeability in the area and therefore an increased quality of life for the surrounding population of residents and workers;**
- **The effectively blank-slate opportunity it offers to pioneer the delivery of an innovative, compact, connected, accessible, permeable, high-density, high-quality residential development characterised by a distinct sense of place that consciously responds to the most pressing concerns of our times – climate change and the new ways of living in cities that the Covid-19 pandemic has brought about; and**
- **The prime location of the site, as outlined above (its proximity to high-frequency public transport corridors, public amenities, hubs of employment, education, enterprise, retail and culture, and the connectivity of the site in terms of metropolitan, regional, national and international links), combined with the compact, high-density and mixed-use nature of the proposed development will facilitate the realisation of a truly sustainable new suburban Cork City neighbourhood hub, where the residential experience is characterised to a great extent by the use of sustainable modes of transport in conjunction with the enjoyment of quality, diverse public and private open spaces, all in a setting of high-quality architectural design.**

3.0 Planning History

The proposed development site has been subject to several planning applications in the past, as have the lands in the immediate vicinity and the wider south inner-city suburbs generally. A review of these provides a useful context within which the proposed development can be presented and analysed.

3.1 Planning History of the Subject Site

Application Register Reference 17/37528: Permission was applied for on the 11th of August 2017 in respect of a retail warehousing/retail showrooms/medical services development. The application was subsequently withdrawn on the 5th of October 2017.

Application Register Reference 06/30717: Permission was granted on the 22nd of September 2006 for the demolition and removal of existing buildings, the diversion of the municipal sewer around the site, and the carrying out of ground remediation works.

Application Register Reference PL28.206292 (03/27881): Outline permission was granted on the 30th of August 2004, after a first party appeal, for a 4-storey office building with a total floorspace area of 5000m² and associated car park on the southern 1.55ha portion of the site.

3.2 Relevant Planning History in the Vicinity of the Site

The vicinity of the site is defined to the east by the South Link Road, to the north by the Tory Top Road neighbourhood district centre, to the west by the roundabout junction between Tramore Road and Pouladuff Road, and to the south by the South Ring Road.

Ballyphehane Gaelscoil (approx. 570m north-west of the subject site)

Application Register Reference 20/39396: Permission was granted for the retention of 3 no. single storey temporary classroom units and toilets.

Coláiste Stiofáin Naofa (approx. 900m west of the subject site)

Application Register Reference 20/39252: Permission was granted for the provision of temporary primary school accommodation by way of construction of a pre-fabricated buildings (c.275m²) with associated site works including relocation of displaced car parking spaces as a result of proposed development, boundary treatments, bicycle parking etc.

226/228, Connolly Road (approx. 600m west of the subject site)

Application Register Reference 21/39879: Permission for the retention of modifications to the previously approved development under PP Ref: 18/37823 was granted on the 7th May 2021. The modifications include:

(1) The installation of 16.0sq/m of roof mounted photo voltaic solar panels on each dwelling. (2) The provision of disability access ramps to the front elevation of both dwellings. (3) The omission of 1 no. window at ground floor level on the northern elevation of house no. 226 and the western elevation of house no. 228. (4) The repositioning of approved patio door on the southern elevation of house no. 228.

Application Register Reference 18/37823: Permission was granted for the change of use from a bicycle and pram shop to residential use (2 No. Dwelling houses), including the demolition of side and rear extensions (single-storey), and the construction of a two-storey side extension to the east and west elevations. Changes to the front elevations

included the removal of shop fronts and replacement with domestic windows and doors. Off road parking for each dwelling house was permitted.

Cork Mosque Islamic Cultural Centre, Tramore Road (approx. 750m south-west of the subject site)

Application Register Reference 10/34447: Permission was granted for the change of use from a light industrial premises (the former Modern Plant Premises, Tramore Road) to social and community centre including prayer hall, classrooms, library, meeting rooms, administration, relocation of entrance, alterations to the roof, front, rear and side elevations of the building including the addition of glazed window units to the east and north elevations and including an extension to the west elevation on two floors, an entrance porch, canopy and tower to the north elevation, internal alterations including mezzanine floor extension and associated site development works.

This application involved approval by the elected members of Cork City Council to materially contravene the Cork City Development Plan 2009-2015. This is owing to the fact that the site was zoned "Light Industry and Related Uses" and the proposed use was for cultural use as a social and community centre and place of worship. The Planner's Report noted that the definition of a light industrial building in the development plan corresponded with processes being carried out in the building that were not detrimental to the amenity of a residential area if installed there. In addition, the Planner's report noted that:

The Development Plan identifies the Tramore Road as area (which would include the proposed development site and lands surrounding it) as a potential area for mixed use redevelopment and renewal. However, the Development Plan is clear that such redevelopment is planned over the long term.

DAOL Business Centre, Tramore Road (approx. 920m south-west of the subject site)

Application Register Reference 16/37164: Permission was granted for the construction of a new 135m² light industrial unit immediately to the south of the existing, much larger unit on site. The Planner's Report did not highlight any issues with the principle of the proposed development.

Drew's Filling Station, Turner's Cross (approx. 125m north-east of the subject site)

Application Register Reference 16/37130: Permission was granted for the retention of works to an established fuel filling operation at the former Turner's Cross Motors, Kinsale Road, Cork including: replacement of former pumps and canopy with 2 No. new fuel filling pumps and new canopy structure; reinstatement of totem signage; installation of air pump and vacuum equipment; erection of 2 No. outdoor self service laundrettes; subdivision and change of use of the formers Turner's Cross Motors premises to include shop and associated storage areas, coffee shop and associated kitchen and toilet facilities, all with associated signage; alterations to southern and western elevations, and; a single-storey rear extension. The retention of a barber shop onsite was refused permission by means of a condition.

The Planner's Report stated that the sale of fuel from the site was an established, non-conforming use in terms of the zoning objective for the site and that the planning authority considered this to be acceptable. The Planner's Report commented on the mixed-use nature of development in the vicinity of the site, stating that they were obliged to take into account the:

...uses prevalent in the surrounding area, including a McDonald's restaurant, a retail warehouse park, car showroom, and an 8,200 capacity rugby stadium.

Application Register Reference 16/36919: Permission was granted for the retention of an over ground LPG storage tank and associated fuel filling pump, and temporary permission to retain 4 no. 6000 litre over ground diesel fuel storage tanks, associated fuel filling pump, and screen fencing to service station.

Former Tobrico Premises, Lowlands Industrial Estate, Tramore Road (approx. 650m south-west of the site)

Application Register Reference PL 28.242082 (13/35569): Permission was refused on third party appeal for a change of use from industrial to commercial/ leisure use – snooker hall.

Application Register Reference 10/34689: Permission was granted for a 3-year temporary change of use from existing industrial use to commercial/leisure use (Yoga studio).

Kinsale Road Commercial Centre (approx. 250m south of the subject site)

Application Register Reference 19/4019: Permission was granted for the construction of a first-floor extension to provide an office at an existing carpet retail store, as well as alterations to elevations and signage.

Kinsale Road Retail Park (immediately east of the subject site)

Application Register Reference 19/38786: Permission was granted for the construction of a single storey café and a single storey restaurant along the site's boundary with the Kinsale Road, on the grounds of a surface car park that serves the established retail park. The proposed development included the replacement of approximately 35 car parking spaces. The Planner's Report noted that the site was zoned "Retail Warehousing" and that the café and restaurant uses did not fall within the definition of what is considered ancillary to the retail of bulky goods. Nevertheless, the Planner's Report stated that the proposed uses were acceptable at this location as they could be considered as being ancillary to the retail warehousing function of the surrounding retail park in that they would provide an ancillary and supportive use to the dominating function of the retail warehousing, and they would not directly compete with the permitted, established retail warehouse use of the retail park.

In addition, the Planner's Report stated that:

Furthermore, the Tramore Road/Kinsale Road area could provide a catchment for the café and that includes a sizeable employment base.

Application Register Reference ABP-307025-20 (19/38739): Permission was granted for the construction of a retail warehouse unit including associated access, car parking, bicycle parking, hard and soft landscaping and signage. The Planner's Report noted serious concerns with the overbearing impact of the development on adjacent residential dwellings. Cork City Council therefore conditioned the permitted unit to be reduced in width to 10m.

Following a successful first party appeal, the width of the unit was granted as the applicant had proposed after being requested for further information from Cork City Council.

Application Register Reference 17/37358: Permission was granted for alterations to the façade of a retail warehouse unit in respect of a coffee shop use that had previously been permitted under application register reference number PL28.241755 (12/35485).

Application Register Reference 16/36977: Permission was granted for the construction of a retail warehouse unit and all associated ancillary development works including access, car parking, landscaping and signage. The Planner's Report recorded no issue with the proposal in principle or otherwise.

Application Register Reference 15/36437: Permission was granted for permission an increase of 177m² gross floor area in the mezzanine storage in the previously permitted retail warehouse unit under application register reference number PL28.241755 (12/35485). Permission was also granted for the use of the unit for the sale of household goods, including furniture, and furnishings, household appliances, and tools and equipment for the house and garden, as per the range of goods set out in the application documentation.

Application Register Reference PL 28.241755 (12/35485): Permission was granted, subsequent to a first party appeal regarding a condition, for the construction of a retail warehouse unit, café and all associated ancillary development works including access, car parking, landscaping and signage.

Manhattan Bar (approx. 465m west of the subject site)

Application Register Reference ABP-312609-22 (21/40066): A third party appeal was lodged on 31st January 2022 in respect of Cork City Council's decision to grant permission for the demolition of the existing commercial premises and the construction of a 4-storey apartment block with 26 no. units. Following a request for further information, the height of the granted apartment block was reduced to 3 storeys and the number of apartments to 24 no. The site area is 0.131ha and the revised scheme represents a density of 183 units/ha. The case is due to be decided by 7th June 2022.

McDonald's Restaurant (north of the subject site)

Application Register Reference ABP-305539-19 (19/38537): Subsequent to a first party appeal, permission was granted for the extension of opening hours of the drive through restaurant from 7am-11pm to 7am-12am and refused for alterations to existing car park layout for 9 No. additional standard car parking spaces and 1 No. additional accessible parking space and additional medium height landscaping.

Application Register Reference PL28.249310 (16/37203): Permission for the retention of the existing boundary treatment to the west of the site, which includes a 2.4m high paladin fence over a painted block wall with concrete capping (height varying to suit the ground level) and permission for new planting and landscaping treatments along the western site boundary was granted following a third party appeal.

Application Register Reference PL28.246038 (15/36604): Permission was refused following a third party appeal for the retention of a 2.4m high paladin fence along the western site boundary.

Application Register Reference PL28.244280 (14/36158): Subsequent to a first party appeal, permission was granted to extend the opening hours of the drive through restaurant from 7am-10pm to 7am-11pm and refused for a 6m totem sign and for the provision of full junction for access/egress to the site.

Application Register Reference 13/35825: Permission was granted for the development of a single storey drive-thru restaurant (361m²) including the ancillary sale of hot food for consumption off the premises, incorporating an enclosed yard (65m²) with an overall gross floor area of 432m². The development also consisted of the demolition of an approximately 3m high wall (195m wide) along Kinsale Road and Tramore Road, and the construction of a new boundary treatment on the southern, eastern and western boundaries of the site comprising a stone wall and

timber fence, provision of a new vehicular and pedestrian entrance to the site off the Kinsale Road; 65 No car parking spaces; parking stands; a height restrictor; 2 No. customer order points with canopies; associated elevational and free-standing signage; hard and soft landscaping; and all ancillary and associated works.

Morning Star National School (approx. 600m from the subject site)

Application Register Reference 15/36523: Permission was granted for the construction of a single storey 3 classroom ADS unit school extension with all ancillary accommodation, to construct a new resource room, toilet facilities and a new boiler room, to erect poles and a ball stop net to the rear of the school, to demolish the existing water tower, rear toilet building and storage buildings to accommodate the proposed extensions, to carry out alterations to both existing site entrances including widening both entrances, to create a new pedestrian entrance, to construct a new fence on extended site boundary and all associated site works.

Musgrave Park (immediately north of the subject site)

Application Register Reference 21/40418: Permission was granted for the erection of 6 no. floodlight poles, each 15m high to light their playing pitch.

Application Register Reference 18/38083: Permission was granted for the construction of an indoor training facility, a single storey ticketing booth and all other ancillary site works including associated car/coach parking and servicing upgrades. The proposed indoor training facility will contain a synthetic all-weather playing surface, gymnasium, dressing rooms, treatment rooms, kitchen, public toilets and storage space. The proposed development will be accessed via 2 no. existing entrances from Pearse Road.

Application Register Reference 18/37790: Permission was granted for the retention of the construction of a new gymnasium and changing facilities and the relocation of the existing gymnasium for use as a store.

Application Register Reference 17/37285: Permission was granted to erect 6 No. floodlighting poles, each 18.3m. high, to light Sunday's Well Rugby Football Club's playing pitch.

Musgrave Retail Partners Ireland logistics and warehousing operations (immediately adjacent to the subject site to the west)

Application Register Reference 17/37455: Permission was granted for the construction of a single storey gatehouse building located on the eastern (Kinsale road) side of the site.

Application Register Reference 16/37017: Permission for the construction of a single storey extension on the Northern, Western and Southern sides of the existing garage/workshop building and to carry out internal alterations in the building, the development will also include all associated site works and services.

Application Register Reference 07/32547: Permission was granted on the 17th of December 2007 for the construction of an additional floor level with a gross floor area of 882m² to a previously authorised 3-storey office building (under application register reference 06/31294) that was under construction at the time, bringing the office building to a total of 4-storeys in height.

Application Register Reference 06/31294: Permission was granted on the 8th of February 2007 to construct a 3-storey office building with a total gross floor area of 2880m² and associated car park at a distance of 3m from the western boundary of the proposed development site that is the subject of this current SHD application.

Right Price Tiles (immediately north-east of the subject site)

Application Register Reference 05/29450: Permission was granted for the demolition of an existing two storey dwelling house and garage, construction of single storey car showroom of floor area 520.48sqm, external alterations to existing showroom including additional signage, alterations to site curtilage resulting in external wall realignments, alterations to existing site entrance, construction of light vehicular shelter, 3.8m high, area of 138sqm, creation of two new vehicular entrances from service road, previously granted under TP03/26971, provision of parking for 49 cars, provision of new signage for existing and proposed buildings, including stand alone signage pylons adjacent to existing showroom and all ancillary site works, boundary fencing, site lighting and services.

The occupying use of this car showroom has changed in recent years, with a Laura Ashely furniture store being followed by, most recently, a Right Price Tiles retail outlet.

South Ring West Business Park, Tramore Road (approx. 700m south-west of the subject site)

Application Register Reference 17/37546: Permission was granted for the retention of a two-storey brick office building with a total gross floor area of 90m². Permission was granted on the basis that the building would only be used as an office that was ancillary to the Light Industrial zoning uses in the immediate vicinity of the building, namely those in use at the South Ring West Business Park.

Tramore Commercial Park, Tramore Road (approx. 450m south-west of the subject site)

Application Register Reference 20/39158: Permission was granted for the refurbishing of an existing storage unit to provide a showroom with a new glazed entrance, for a repositioned roller shutter door to replace existing dock leveller, for the construction of new access ramps and steps, and for the application of cladding to the exterior wall.

3.3 Relevant Planning History in wider Cork City area

Albert Quay

Application Register Reference ABP-304987-19 (Case Reference Number: PL28.304987): On the 25th of February 2021, An Bord Pleanála granted permission for an SHD comprising 201no. Build-To-Rent apartments in a building that ranges in height from 8, 11 to 24 storeys over ground floor on a city centre site with an area of 0.38Ha. Other uses included shared lounge areas, meeting rooms, co-working space, media room and games room, as well as a gym, café, 1no. commercial unit; office uses and a bar/restaurant in the former Cork, Blackrock and Passage West Railway terminus.

Alleyquay Developments, South Docklands

Application Register Reference 08/32919: Cork City Council granted a 10-year permission for a mixed-use development of residential use, offices, local services, retail use, and an events centre, including three residential towers of 10, 20 and 27 storeys.

Bessboro, Blackrock

Application Register Reference ABP-308790-20 (Case Reference Number: PL28.308790): On the 25th May 2021 permission was refused for an SHD comprising 179no. apartments and a creche in 3no. apartment buildings ranging in height from 5 to 7 storeys on a site with an area of 1.15Ha. The reasons for refusal related to the fact that the site may have been used in the past as a children's burial ground and that, until this is established as being the case or not, granting permission for the development of the site would be premature.

Crow's Nest, Victoria Cross

Application Register Reference ABP-300325-17 (Case Reference Number: PL28.300325): On the 6th of March 2018 An Bord Pleanála granted permission for an SHD comprising 66no. student apartments with 265no. bed spaces in 4no. apartment buildings ranging in height from 8 to 10 storeys over ground floor at the site of the former Crow's Nest, at the junction of the Carrigrohane Road and Victoria Cross Road, Cork.

Of note is that the Inspector's Report, which recommended a grant of permission, states that, 'there is a rhythm created by the change in height along the Carrigrohane frontage from 8 storeys (Building A) increasing to 9-storeys (Building B) and culminating in 10-storeys (Building C), the focal building at the junction of Victoria Cross and Carrigrohane Road'.

Custom House Quay

Application Register Reference 19/38589: Permission was granted on the 13th of October 2020 for the redevelopment of the Custom House site at North Custom House Quay and South Custom House Quay, Custom House Street, Cork City to provide a 240-bedroom, 34-storey tower hotel, 25no. hotel serviced suites, and a range of commercial uses including retail, office, food and beverage, distillery, tourism and leisure. The redevelopment will have a gross floor area of approximately 31,604m². The proposed development consists of the carrying out of works to Protected Structures PS060, PS818 and PS163. This decision was appealed by third parties to An Bord Pleanála (Case reference: PL28 .308596), and permission was granted on 22nd of March 2021.

Cork City Council's submission regarding the appeal states the following:

In terms of compliance with policy objectives set out in Chapters 8, 10 and 13 of the City Development Plan, the Planning Authority accepts that the proposed tower structure is a significant alteration of visual approach into the city and the setting of the city centre. However, the proposed development is part of the city's evolving skyline.

In addition, Cork City Council submit that, in making their decision, they were required to have regard to the *Urban Development and Building Height Guidelines (2018)* as a tool to deliver high density development to meet objectives as set out in the National Planning Framework. In justifying their decision to grant the proposed development permission, Cork City Council further submit that:

While specific building height guidance is set out in Chapter 16 of the City Development Plan, SPRR 3 of the guidelines requires that a Planning Authority must assess a proposal for a building of height against development management criteria and other specific assessments set out in the guidelines.

Cork City Council further submit that, regarding the urban design of the proposed development:

In Classical Architecture or Ancient Architecture, the use of a vertical structure whether a column or obelisk acts as an entrance or landmark giving an identity or sense of place to an area.

Furthermore, Cork City Council state in their submission that:

The ambitions of the NPF and RSES and the SPRRs of the Urban Development and Building Height Guidelines (2018) have altered the planning landscape and projects of scale are integral elements to achieving these ambitions.

Horgan's Quay

Application Register Reference ABP-305278-19 (Case Reference Number: PL28.305278): On the 13th of November 2019 An Bord Pleanála granted permission for an SHD comprising 302no. Built-To-Rent apartments in a single apartment building ranging in height from 8 to 10 storeys over ground floor. This application was an alteration of a scheme previously permitted for 216no. Build-To-Rent units in 4no. apartment buildings ranging in height from 7 to 10 storeys on the same site under application register reference 17/37563.

Application Register Reference 17/37563: Permission was granted on the 23rd of February 2018 for the redevelopment of a site at Horgan's Quay, Railway Street, Lower Glanmire Road, Cork to provide for a mixed use residential, office, hotel and retail development of up to 11 storeys, with ancillary crèche, landscaping and public realm works resulting in the creation of 4 no. public spaces with an area of 5,080m², services and site development works. Construction has completed in respect of the permitted 9 storey hotel and offices.

Jacob's Island, Mahon

Application Register Reference ABP-301991-18: An Bord Pleanála granted permission for an SHD development comprising 413no. apartments in 6no. buildings ranging in height from 6 to 25 storeys. The Inspector's Report states that:

the proposed development before the Board has been designed to maximise the efficient use of land and provide a significant quantum of residential units... My own view is that waterfront locations provide an ideal context for tall buildings and in this case the strategic gateway location to Mahon and Cork City beyond is opportune.... I am satisfied that the scale, massing and most importantly height is acceptable. In addition, given the proportions of the ancillary nine storey building to the south of the tower, I would advise against any attempts to reduce the overall height. Any reduction in height, would in my opinion, injure the architectural integrity of the composition and result in a sub-standard tower building.

Navigation House and adjoining warehouses, Albert Quay

Application Register Reference 19/38429: Permission was granted for the construction of 1 no. office building, Building C, 4 storeys over ground floor with setbacks of the top floors including provision for a roof terrace. The proposed development included the change of use from office to café/restaurant on the ground floor and general offices and/or business & technology uses and/or office based industry uses on all floors above ground floor to accommodate a single user or multiple users. The proposed development also included the provision for a commemoration plaque, ancillary services and ancillary site works.

Application Register Reference 16/36773: Permission granted for a multi storey office development bounded by Albert Quay East, fronting onto Victoria Road, Albert Road and Albert Street. The proposed development includes 4 no. office buildings ranging from three to six storeys over ground floor with set back of the top floors and roof terraces. The proposal also allows for the demolition of existing structures including the part demolition of Navigation House and part of the former Cork, Blackrock, Passage Railway structure.

Application Register Reference PL28. 240487 (11/34944): Permission was granted by An Bord Pleanála for the construction of a multi-purpose events/ convention centre with an overall gross floor area of 8,425 sq.m., including the demolition of all existing buildings on site, except for the façade of Navigation House.

One Albert Quay

Application Register Reference 14/36015: Permission was granted for the demolition of existing buildings to allow for the construction of a mixed-use development consisting of office development on six floors over ground floor to provide for business and technology based industry uses.

Orchard Road, Victoria Cross

Application Register Reference ABP-307441-20 (Case Reference Number: PL28.307441): On the 19th of October 2020 An Bord Pleanála granted permission for an SHD comprising 30no. student apartments with 216no. bed spaces in 3.no apartment buildings ranging in height from 1 to 5 storeys at San Paula, Orchard Road, Cork. The proposed development also includes a study/meeting room, lounge, cinema/media presentation room, reception area, management offices and storage.

On the 17th December 2020, the High Court granted leave to a local residents' organisation to bring a judicial review case against An Bord Pleanála, the Minister for Housing, Local Government and Heritage, and Ireland and the Attorney General in respect of An Bord Pleanála's decision to grant permission for this SHD.

Penrose Dock

Application Register Reference 19/38338: Application for permission for the demolition of all buildings and structures; the construction of a two building office development, consisting of a six storey over ground floor building to Penrose Quay (Building 01), with part rooftop terrace, rooftop photovoltaic solar panel array, and rooftop plant; a seven storey over ground floor building to Alfred Street plus rooftop photovoltaic solar panel array, and rooftop plant, including a café at ground floor level fronting onto Alfred Street (Building 02). This application was granted permission on 9th of October, 2019, as 2no. six storey office buildings and 1no. basement car park.

Application Register Reference 19/38216: Permission was granted for development which will consist of the construction of a roof top terrace on part of the roof of Building B of the Penrose Dock office development (as permitted under Cork City Council planning reference 18/37909 and under construction). The proposed development includes a penthouse enclosed amenity space; and external terrace; and all associated works, including raised walkways; raised atrium rooflight and lift overrun. A notification of decision to grant was issued on the 21st of March 2019. It is noted that the Planner's Report on this application referred to the Urban Development and Building Heights Guidelines (2018), where it was noted that generic maximum building heights in development plans if inflexibly or unreasonably applied can undermine development and hinder innovation in urban design and architecture. The Senior Executive Planner states that it is not considered that the proposed increase in height in this instance would be unreasonable and would not have a detrimental impact on the residential amenity of adjacent dwellings.

Application Register Reference 18/37909: Permission was granted for the demolition of buildings bounded by Railway Street, Alfred Street and Penrose Quay, to the rear of Penrose House, a protected structure (Ref. PS281) and the construction of 2no. office buildings including a six-storey over ground floor building to Penrose Quay and Railway Street (Building A) and an eight storey over ground building to Alfred Street and Railway Street (Building B).

Prism, Clontarf Street

Application Register Reference ABP-302923-18 (Case Reference Number: PL28.302923; 18/37894): An Bord Pleanála granted permission after a third party appeal for a 15-storey office development plus rooftop terrace on Clontarf Street/Deane Street/Oliver Plunkett Street Lower.

The Board determined that it would secure the redevelopment of underutilised urban land in a prime city centre location strategically positioned close to a major transport node; would be consistent with national and local policy measures and guidance which seeks to secure more compact and higher density development in city centre areas; would integrate satisfactorily with the surrounding existing development and with the established character of the sensitive historic city centre, would enhance the skyline of the area; would make a positive contribution to the urban character of the area; would not seriously injure the amenities of development in the area and the character and appearance of Protected Structures in the area; would not have a significant and detrimental impact on any important views and vistas within the city, and would be acceptable in terms of public and private transport and pedestrian safety and convenience.

Railway Gardens, South Link Road

Application Register Reference ABP-305173-19 (Case Reference Number: PL28.305173): On the 28th of November 2019 An Bord Pleanála granted permission for an SHD comprising 118no. Build-To-Rent apartments in 2no. buildings ranging in height from 3 to 17 storeys on a brownfield site adjacent to the South Link Road, Cork. The Inspector's Report stated that:

I am of the opinion that this is a zoned, serviceable site within an established urban area where a wide range of services and facilities exist. I have no information before me to believe that the proposal, if permitted, would put undue strain on services and facilities in the area. In my opinion, the proposal will provide a high quality development, with an appropriate mix of units and an acceptable density of development catering to a certain cohort of the population. I am satisfied that the proposal will not impact on the visual or residential amenities of the area, to such an extent as to warrant a refusal of permission.

St. Kevin's, Shanakiel

Application Register Reference ABP-308923-20 (Case Reference Number: PL28.308923): On the 15th April 2021 permission was granted in respect of an SHD comprising 266no. residential units (specifically, 46no. houses and 220no. apartments), a creche and an enterprise office centre in 21 buildings (in addition to the former hospital building itself) ranging from 2 to 4 storeys on a site with an area of c. 5.1Ha and at the former St. Kevin's Hospital Grounds, with St. Kevin's Hospital building being a recorded protected structure ('Our Lady's Hospital', RPS Ref. PS620).

The Former Ford Distribution Site, South Docklands

Application Register Reference ABP-309059-20 (Case Reference Number: PL28.309059): On the 20th April 2021 permission was granted in respect of an SHD comprising 1,002no. apartments and 5no. retail units, a Montessori school, a creche, a medical centre, bar, café, venue/performance area, and 2 no. community resource spaces in 12no. buildings ranging in height from 4 to 14 storeys on a site with an area of 5.97Ha at the Former Ford Distribution Site, fronting on to Centre Park Road, Marquee Road and Monahan's Road.

Victoria Cross

Application Register Reference ABP-310105-21: Permission was granted on the 18th of August 2021 for the demolition of existing structures and the construction of 243 no. student bed spaces (40no. student apartments comprising 3no. studio apartments, 6no. 3-bed apartments, 6no. 4-bed apartments, 1. no. 6-bedroom apartment, and 24 no. 8-bedroom apartments) in 1no. building of 5 to 10 storeys, and associated site works at the site of Kellehers Auto Centre, Wilton Road, Victoria Cross.

Victoria Road

Application Register Reference 18/38012: Permission was granted on the 8th of January 2019 for a mixed use residential and commercial development on the site No. 5 Victoria Road, Cork City a recorded protected structure (RPS Ref. PS1139). The development will consist of 19 no. residential units with ground floor café, restaurant, service and amenity space. The building ranges from 6 to 10 storeys with ground floor café, amenity space, service uses and ancillary restaurant use.

Lands between Kennedy Quay, (North) Marina Walk (South), Victoria Road (West) and Mill Road (East)

Application Register Reference 21/40702: Application for a 10-year planning permission for a proposed mixed-use development comprising 4 no. new buildings and the conversion of the Odlum's Building (Record of Protected Structures (RPS) ref. PS856) over a total planning application site area of 1.437 Ha bounded by Kennedy Quay to the north, Marina Walk to the south, Victoria Road to the west and Mill Road to the east, all in the South Docklands of Cork City. The application area is in two parts consisting of a site adjoining Victoria Road to the west and a site adjoining Mill Road to the east. Development proposed in the western part of the planning application area consists of new development to a maximum of 12 no. storeys: (a) Site clearance including the demolition of existing structures consisting of 2 no. silo buildings (R & H Hall) with associated covered conveyors and ancillary single storey buildings, and existing boundary treatments. (b) The construction of 4 no. buildings ranging in height from 9 to 12 storeys over a double basement: Block B of approx. 8,381 sq.m. and 11 no. storeys to hold ground floor convenience retail and entrance to overhead 80 no. apartments (30 no. one bed; 40 no. two bed and 10 no. three bed). Block C1 of approx. 12,169 sq.m. and 9 no. storeys to hold ground floor café and office space, upper floors to be used as office space. The office spaces have been designed to be suitable for a single user or multiple users with subdivisions. Block C2 of approx. 10,633 sq.m. and 9 no. storeys to hold ground floor café and office space, upper floors to be used as office space. The office spaces have been designed to be suitable for a single user or multiple users with subdivisions. Block C3 of approx. 16,212 sq.m. and 12 no. storeys to hold ground floor whole foods convenience store and entrance to office space. Upper floors to be used as office space, the office spaces have been designed to be suitable for a single user or multiple users with subdivisions. Development proposed in the eastern part of the planning application area consists of reuse of the Odlum's building and new development to a maximum of 9 no. storeys as follows: (c) Conservation works including part demolition, alterations, extension and change of use of the Odlum's Building (RPS ref. PS856) to provide for; retail and/or café use, office space, conference facilities, food and beverage space, a cinema including a bar/ dining area, a bar/restaurant and 84 no. apartments (35 no. one bed; 35 no. two bed, and 14 no. three beds). Further information was requested on 4th February 2022.

Site bounded by Kennedy Quay, to the north and Victoria Road, to the west in the South Docklands of Cork City

Application Register Reference: 21/40713: Application for a 10-year planning permission for a proposed rehabilitation hospital on a triangular planning application site area of 0.249 Ha bounded by Kennedy Quay to the north and Victoria Road to the west in the South Docklands of Cork City. Development proposed consists of: (A) Site clearance consisting of the remainder of former administration buildings (part single and two storey on Kennedy Quay with associated weighbridge), and existing boundary treatments. (B) The construction of one 7 storey

building over a double basement of 11,332 sq.m. to be used as a rehabilitation hospital. The proposed rehabilitation hospital is to hold 130 no. individual patient rooms over 5 floors (2nd to 6th floors) with associated first and ground floor uses. First floor uses include; offices, consulting and treatment rooms. Ground floor uses include; reception, café/restaurant, pharmacy, offices and therapy pool. (C) The double basement proposed is to provide car, motorcycle and bicycle parking, patient intake and services areas. (D) Vehicular access to the double basement is to be from Marina Walk. This access is the subject of a concurrent planning application. The proposed development includes all associated and ancillary development and servicing works, including storage, plant and management facilities. This proposal is concurrent with another by the same applicant for a mixed-use development, proposed to be located to the immediate east of this application site. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) prepared in respect of the proposed development and the neighbouring proposed mixed-use development accompany this planning application. Further information was requested on 9th February 2022.

Corner of Alfred Street, and Railway Street, Cork

Application Register Reference 21/40076: An application for permission for the demolition of the existing warehouse buildings and construction of a residential apartment building ranging in height between 1 and 10 storeys and consisting of 78 no. units with ground floor café/retail unit and all ancillary site works at the corner of Alfred Street and Railway Street, Cork. The proposed development will consist of 6 no. 2-bedroom apartments, 43 no. 1-bedroom apartments, 29 no. studio apartments. The proposed ground floor will consist of a reception area, communal area, concierge desk and security office, kitchen, staff welfare facilities, meeting room, café/retail unit and secure bicycle parking area. Ancillary site works to include provision of communal open space roof terraces at first and seventh floor levels, residents lounge at first floor level, landscaping, ESB substation, generator room, LV room, sprinkler tank room, water meter room, comms room and storage. Further information was requested on 3rd June 2021. An extension of time to respond was granted on 1st December 2021. The applicant's response was made on 14th December 2021 and further clarification was sought on 19th January 2022.

The Kinsale Road, Ballycureen, Cork

Application Register Reference 21/40353: Application for permission for the demolition and removal of an existing dwelling and ancillary structures and the construction of a mixed-use residential and commercial development in 13 no. blocks comprising: 134 no. residential units in 12 no. 3-storey blocks (comprising a mix of 1,2 and 3 bed apartments/duplexes), a 3 storey neighbourhood centre building (block 10) which includes a restaurant/take-away, convenience retail, gym, dentist, physio, hairdressers and outdoor amenity at roof level; a creche (included in Block 9); a 158 no. bed hotel (Block 7, which primarily ranges in height from 6 to 9 storeys with a 2-storey annex) and which includes a swimming pool, gym, bar, cafe, restaurant and function room; a new entrance/signalised junction and improvements to the N27 including 2 no. bus stops, cycle lane and footpaths; and all associated ancillary development works including an ESB sub-station, landscaping and amenity areas, solar panels (at roof level), bin storage, car and bicycle parking. Further information requested on 6th September 2021 and further clarification was sought on 25th November 2021.

3.4 Summary

An assessment of all aspects of this planning history reveals the following key issues that guide the strategy for the proposed development:

- **There is an evolving trend away from the predominance of exclusively light industry and retail warehouse uses in the vicinity of the subject site towards a more diverse mix of land uses. This suggests that the area is evolving into a more suitable location for residential development than it might have been in the past. In particular, Variation No. 6 of the *Cork City Development Plan 2015-2021* (discussed in Section 6 of this report) confirms that this is the case.**
- **National policy advocates a presumption in favour of tall buildings in locations where it can be demonstrated that the proposal is acceptable on architectural, urban design, visual impact, sustainability and technical grounds.**
- **The principle of high-density primarily residential development is now established in Cork City as acceptable, in line with national policy objectives.**
- **The development of taller buildings and the densification of development, including residential, on brownfield sites in Cork City is acceptable and reasonable, being supported by national policy. Tall buildings are considered to make a positive contribution to the urban character of Cork and contribute to Cork’s contemporary evolving skyline – their acceptability is not merely restricted to the centre of Cork City but extends to include sites in Cork’s suburbs as well.**
- **The principle for taller buildings in locations other than those specified in the Cork City Development Plan 2015-2021 is acceptable.**
- **The indicative dwelling mix targets contained in Table 16.4 of the Cork City Development Plan 2015-2021 are very much indicative only, and contemporary demographic trends, lifestyle choices and corresponding market demand inform the dwelling mix of schemes in Cork.**
- **The choices of developers and the decisions of Cork City Council and An Bord Pleanála are each facilitating a move towards fully supporting national consolidated growth objectives that have been set out for Cork, Ireland’s second city.**
- **Following significant investment in commercial development in recent years, the case for high density residential uses in Cork is now more favourable.**

Tables 1, 2 and 3 below profile recent decisions and current applications awaiting final decisions regarding the themes of height, high-density and dwelling mix in Cork City.

Storeys	Cork City Centre	Wider Cork City	Storeys
34	<i>Custom House Quay</i>	<i>Jacob’s Island</i>	25
24	<i>Albert Quay</i>	<i>The Former Ford Distribution Site</i>	14
17	<i>Railway Gardens</i>	<i>Crow’s Nest</i>	10

15	<i>Prism</i>	<i>Bessboro</i>	7
11	<i>Horgan's Quay</i>	<i>Orchard Road*</i>	5
10	<i>Victoria Road</i>	<i>St. Kevin's</i>	4

Table 1. Demonstrable trend for tall buildings in Cork City. (* indicates final decision not yet made).

Density	Cork City Centre	Wider Cork City	Density
530 units/ha	<i>Albert Quay</i>	<i>The Former Ford Distribution Site</i>	247 units/ha
495 units/ha	<i>Horgan's Quay</i>	<i>Crow's Nest</i>	220 units/ha
454 units/ha	<i>Railway Gardens</i>	<i>Lower Friars Walk*</i>	183 units/ha
238 units/ha	<i>Victoria Road</i>	<i>Jacob's Island</i>	137 units/ha

Table 2. Demonstrable trend for high-density residential development in Cork City. (* indicates final decision not yet made).

Mix	Zones 1 and 2	Zone 3	Mix
1-bed = 47% 2-bed = 51% 3-bed = 2%	<i>Albert Quay</i>	<i>St. Kevin's</i>	1-bed = 14% 2-bed = 48.5% 3-bed = 25.5% 4-bed = 12%
1-bed = 36% 2-bed = 64% 3-bed = 0%	<i>Horgan's Quay</i>	<i>Crow's Nest</i>	1-bed = 0% 2-bed = 1.5% 3-bed = 10.5% 4-bed = 88%
Studio = 24.6% 1-bed = 35.6% 2-bed = 35.6% 3-bed = 4.2%	<i>Railway Gardens</i>	<i>Orchard Road*</i>	1-bed = 0% 2-bed = 0% 3-bed = 0% 4-bed = 3.3% 6-bed = 33.3% 8-bed = 63.3%
1-bed = 31.6% 2-bed = 52.6% 3-bed = 15.8%	<i>Victoria Road</i>	<i>Jacob's Island</i>	Studio = 6.1% 1-bed = 16.9% 2-bed = 72.2% 3-bed = 4.8%
1-bed = 20% 2-bed = 59% 3-bed = 21%	<i>South Docklands</i>	<i>Victoria Cross</i>	Studio = 7.5% 1-bed = 0% 2-bed = 0% 3-bed = 15% 4-bed = 15% 6-bed = 2.5% 8-bed = 60%
Studio = 3.8% 1-bed = 31.1% 2-bed = 50.2% 3-bed = 14.9%	<i>The Former Ford Distribution Site</i>	<i>Lower Friars Walk*</i>	1-bed = 50% 2-bed = 50% 3-bed = 0%

Table 3. Demonstrable trend for dwelling mixes in Cork City. (* indicates final decision not yet made).

Tables 4, 5 and 6 below profile recent decisions and current applications awaiting final decisions regarding height, high-density and dwelling mix in Cork and also include the proposed development (referred to as Creamfields) for context, highlighting that the height, density and dwelling mix of the proposed development can be considered as being reasonable, appropriate and acceptable in the context of permitted height, density and dwelling mix in Cork, taking into account the following key attributes:

- **The large size of this brownfield, generally unconstrained site in single ownership, with dual frontage onto two public roads,**
- **The existing high quality public transport assets in the vicinity, and**
- **The extent of existing and proposed social and community infrastructure in the vicinity.**

Storeys	Cork City Centre	Wider Cork City	Storeys
34	Custom House Quay	Jacob's Island	25
24	Albert Quay	Creamfields	Up to 15
17	Railway Gardens	The Former Ford Distribution Site	14
15	Prism	Crows Nest	10
10	Victoria Road	Orchard Road*	5
11	Horgan's Quay	St. Kevin's	4

Table 4. Contextualising the height of the proposed development (* indicates final decision not yet made).

Density	Cork City Core	Wider Cork City	Density
530 units/ha	Albert Quay	Creamfields	180 units/ha
454 units/ha	Railway Gardens	The Former Ford Distribution Site	247 units/ha
238 units/ha	Victoria Road	Crows Nest	220 units/ha
495 units/ha	Horgan's Quay	Jacob's Island	137 units/ha

Table 5. Contextualising the residential density of the proposed development.

Mix	Zones 1 and 2	Zone 3	Mix
1-bed = 47% 2-bed = 51% 3-bed = 2%	Albert Quay	Creamfields	1-bed = 31% 2-bed = 55% 3-bed = 8% 4-bed = 6%
1-bed = 36% 2-bed = 64% 3-bed = 0%	Horgan's Quay	St. Kevin's	1-bed = 14% 2-bed = 48.5% 3-bed = 25.5% 4-bed = 12%
Studio = 24.6% 1-bed = 35.6% 2-bed = 35.6% 3-bed = 4.2%	Railway Gardens	Crow's Nest	1-bed = 0% 2-bed = 1.5% 3-bed = 10.5% 4-bed = 88%
1-bed = 31.6% 2-bed = 52.6% 3-bed = 15.8%	Victoria Road	Orchard Road*	1-bed = 0% 2-bed = 0% 3-bed = 0% 4-bed = 3.3% 6-bed = 33.3% 8-bed = 63.3%
1-bed = 20% 2-bed = 59% 3-bed = 21%	South Docklands	Jacob's Island	Studio = 6.1% 1-bed = 16.9% 2-bed = 72.2% 3-bed = 4.8%
Studio = 3.8% 1-bed = 31.1% 2-bed = 50.2% 3-bed = 14.9%	The Former Ford Distribution Site	Lower Friars Walk*	1-bed = 50% 2-bed = 50% 3-bed = 0%

Table 6. Contextualising the dwelling mix of the proposed development (* indicates final decision not yet made).

4.0 Section 247 Pre-Application Consultations

In accordance with Section 247 of the Planning and Development Act, 2000 (as amended), a statutory pre-application consultation meeting was held remotely on Microsoft Teams with Cork City Council on 21st April 2021 in advance of the pre-planning consultation request being made to the Board.

A presentation was given by the various planning agents on behalf of Watfore Limited. A site layout plan was also provided for the scheme which consisted of 756no. apartments in 7no. buildings generally ranging in height from 7-8 storeys, with a 15-storey tall building with a residential density of 256 units/ha. Cork City Council’s minutes of this meeting are included in Appendix A of this report.

A subsequent pre-application consultation was conducted with Cork City Council via email – Watfore Limited’s agent digitally shared revised soft copy design documents with Cork City Council on 25th June 2021 and Cork City Council responded by email on 2nd July 2021. The revised scheme comprised 727no. dwellings including 44no. own-access townhouses and with a residential density of 247 units/ha. Emailed feedback, which includes feedback on the part of Cork City Council Planning Department and separate feedback on the part of Cork City Council Architect, is included in Appendix B of this report.

Watfore Limited’s responses to the feedback given by Cork City Council during the pre-application consultation on 21st April 2021 and in email on 2nd July 2021 are summarised below.

Both Cork City Council’s minutes of the pre-application consultation on 21st April 2021 and their feedback on 2nd July 2021 make reference to a previous meeting held between Watfore Limited and their design team and Cork City Council in September 2020. That meeting was an informal meeting and the first Section 247 pre-planning consultation in respect of a SHD on the subject site was held on 21st April 2021.

In Attendance:	
Gwen Jordan (Cork City Council)	Niall Sheehan (Watfore Limited - applicant)
Brian O’Flynn (Cork City Council)	Christine Kelleher (Watfore Limited - applicant)
Valerie Fenton (Cork City Council)	Tony Reddy (Reddy Architecture and Urbanism)
Cathy Beecher (Cork City Council)	Sean Kearns (Reddy Architecture and Urbanism)
Alison O Rourke (Cork City Council)	Paul Duggan (Reddy Architecture and Urbanism)
Tony Duggan (Cork City Council)	Aiden O’ Neill (Coakley O’Neill Town Planning)
Gillian Tyrrell (Cork City Council)	Naomi Dowds (Coakley O’Neill Town Planning)
	James Duggan (Arup)
	Simon Van Jaarsveld (Arup)
	Stephen Ginn (Arup)
	Daniel Garvey (Arup)
	Jim Kelly (Cunnane Stratton Reynolds)

Table 7. Attendees at Section 247 Pre-Application Consultation held remotely on 21st April 2021.

Cork City Council Summary Feedback – 21 st April 2021	Watfore Limited’s Response
<ul style="list-style-type: none"> Envisage area will be subject to lots of change in coming years. 	<ul style="list-style-type: none"> PCC not included because of commercial gross floor area limit for SHD applications.

<ul style="list-style-type: none"> • Site presents a unique opportunity to redefine and regenerate the area and to provide a mixed-use development characterised by placemaking. • Predominantly a residential proposal and is welcomed as such. • Queried why is the Primary Care Centre (PCC) is not included in the proposed development. • Enquired at what point in time an application for the PCC would be lodged. • Very repetitive building layout which limits the typology being proposed – all apartments. • Density is limiting potential for more diverse layout. • Location of PCC, tall building of 15 storeys and town square correct location. • Character areas not particularly legible, especially from outside the scheme. • Height variations across buildings not sufficient along the site. • A mix of housing types would encourage a more diverse layout and character type areas. • Own door access would create more supervision of public spaces and more opportunities for resident to meet. • Approved of the overall design of the northern portion of the site but concerns re. how the public will know they are entering a secure, supervised residential area in the southern section of the site and there needs to be a transition from public to private space. • Stated that the residential density that accompanied the proposal for rezoning the site was 120 units/ha. • Expected density for this area in forthcoming Draft City Development Plan is likely to be 45-100 units /ha. • However, acknowledgement that the subject site can accommodate higher densities than above. • Recommended a Social Infrastructure Audit be submitted as part of any application for the site. • Welcomed proposed BusConnects route being accounted for in design and phasing of proposed development in line with 2no. key infrastructure projects - BusConnects delivery and pedestrian link to Tramore Valley Park (NTA planning to fund the link). • Recommended 3m wide instead of 2m wide footpath along Kinsale Road – 2m suitable for areas with less footfall. 	<ul style="list-style-type: none"> • Application for PCC will be lodged when full planning permission application (not pre-application consultation) made in respect of SHD. • Boulevard along Kinsale Road and internal streets are good concepts that have been designed well. • There should be a transition between the scheme and the wider area to help the scheme be accepted in the local area. • Agreed with concern for prevailing socio-economic profile of the area and that a greater mix of housing types would attract middle class families to live in the area. Accordia Cambridge (UK) was mentioned as a good example. • Overlooking of public spaces is provided by the apartment buildings, as is the case in other European cities. • There is a step-down level from the public town square to the residential open courtyards. • Nearest houses to the scheme are 170m to the east and 210m to the north – site is therefore at some distance from nearby residential development. • High-densities are appropriate along public transport corridors such as Kinsale Road. • The subject site is more urban than the Accordia Cambridge site. • The policies and population growth targets contained in the National Planning Framework (NPF) mean that we are obliged to develop at high-densities such as that proposed -Docklands can only accommodate 25,000 people but another 100,000 people that should be living in the city in the future. • The permeability of the site for pedestrians in the local area should not be removed. • Own-door access dwellings could be provided on site – and since have been. • 120 units/ha is a miscalculation of the rezoning proposal. 1.95ha of the site was allocated for residential development in the proposal that accompanied the request to have the site rezoned. The rest of the site was allocated for development of a PCC. With 400no. units proposed on 1.95ha, the density was thus 205 units/ha. If this density was to be applied to the current net site area of 2.94ha, it would result in approximately a development of 602no. dwellings (comparable to what is currently proposed in this pre-application consultation pack).
---	---

<ul style="list-style-type: none"> • Recommended a Shadow Analysis and Microclimate Assessment be submitted as part of planning application. • Parking ratio too low – recommend 0.7/0.8 spaces per unit. • Lack of housing mix a concern re. viability of the scheme – houses not as expensive as apartments to build. • Not looking for suburban layout but a mix of typologies should still be possible and would be more appropriate. 	<ul style="list-style-type: none"> • In addition, the proposal that accompanied the request to rezone the site included residential apartment buildings with heights of 6-7 storeys, again comparable to what is currently proposed in this pre-application consultation pack • Committed to preparing a Social Infrastructure Audit. • 3m wide footpath and 2m wide cycle path have since both been incorporated into the design along Kinsale Road. • Preliminary technical note on Daylight and Sunlight submitted as part of this pre-application consultation, as well as a Microclimate Assessment. • Parking ratio considered appropriate given urban location along strategic public and sustainable transport corridor and in light of pressing issue to address climate change by discouraging private vehicle use.
<p>Cork City Council Summary Feedback – 2nd July 2021</p>	<p>Watfore Limited's Response</p>
<ul style="list-style-type: none"> • The introduction of 44 townhouses and a reduction from 753 to 727 residential units were noted. • Concerns remain relating to inadequate distinctive placemaking, community building or a neighbourhood strategy for the proposal, building layout, lack of diversity for both building heights and dwelling typologies within the scheme and the clear visual definition and distinction of the character areas. • Proposed changes do not significantly address the issues raised during the meeting in April 2021. • Own door units are welcome in the southern section of the layout, but the overall unit mix and diversity recommended has not been delivered. The townhouses remain within the built form of an apartment building and would not result in any meaningful variety of building type. • Proposed density still too high and inhibits the overall quality of the layout, public realm and living environment for the future occupants of the scheme. • Rezoning of site was subject to density of approx. 400 units/ha with a PCC. Applicant not bound to this figure, or the density guide for this area in the draft CDP of 40-100 units/ha - Planning Authority could support a higher density than this guide, but the quality of the scheme must deliver on all the points raised above. 	<ul style="list-style-type: none"> • Maintains that high-density is entirely appropriate on this large, brownfield site not abutting lower density residential development and strategically located along a sustainable transport corridor. • High-density also considered appropriate to support the achieving of ambitious population targets set for Cork in the NPF and Regional Spatial and Economic Strategy for the Southern Region. • Nevertheless, typology mix, layout and height have now been diversified, with the inclusion of 2no. 3-storey duplex buildings, all with own-door access dwellings. • Units have thus reduced from 727no. to 706no., and density has thus been reduced from 247 units/ha to 240 units/ha. • All own-door access dwellings i.e. 59no. units have private amenity space, either in the form of front gardens or private rooftop terraces. • The southern boundary of the town square plaza has been redesigned and now provides more of a sense of enclosure by means of the coffee kiosk, with adjacent steps down into the semi-public garden courtyard below. The town square is thus legible as a standalone public space that is distinct from the garden courtyard to the south, where a clear transition between the spaces is evident. • The addition of the 3-storey duplex buildings G and H also help to create a greater sense of enclosure for the garden courtyard to the north of

<ul style="list-style-type: none"> • 247 units/ha would inhibit the delivery of a variety of building and height housing mix on the scheme which would add significantly to the overall quality and desirability of this residential development. It is strongly advised that a more diverse layout with the provisions of houses/duplexes and other house typologies within the scheme, along with apartments, would introduce much needed variety to the scheme, in terms of layout, built form and housing mix. • Private gardens and more localised communal amenity spaces which are defensible from the public areas would address many of the Planning Authority's concerns. • Concerns that the transitional area from the town plaza down into the more private communal amenity zones are not adequate in terms of size and layout to serve the proposed quantum of the intended residents within the scheme. Concern about the open nature of the layout, where a more defensible space should be provided. • Considered that the size of the site can provide a variety of building height and typologies as you move through the site. The lack of variety of building height and mix of residential units is of significant concern. • The design has evolved and, although moving in the right direction, would not go far enough to address the Planning Authority's concerns. The proposal, as it is currently proposed, would be an overdevelopment of the site and would set an undesirable precedent for this area. 	<p>Building G and the upper meadow park to the south of Building H. The duplex buildings demarcate these open spaces as being semi-public ones, where their primary use is for the future residents of the proposed development. This is all achieved without compromising on sunlight and daylight levels available for dwellings and open spaces within the development owing to the limited height of these buildings at 3-storeys.</p> <ul style="list-style-type: none"> • The revised proposed development, as submitted to the Board in this pre-application consultation request, is thus considered to be a high-quality scheme in terms of: <ul style="list-style-type: none"> ✓ Layout ✓ Diversity of typologies and height ✓ Provision of public, semi-public and private amenity spaces, including equipped play areas for children ✓ Variety in terms of land uses and amenities on site ✓ Materials, including 70% of facades (and all outward facing facades) comprising brick ✓ Supporting the choice of sustainable modes of transport and active, healthy lifestyles ✓ Permeability ✓ Potential to kickstart the regeneration of the wider area
--	--

Table 8. Summary of feedback and responses regarding Section 247 Pre-Application Consultations with Cork City Council.

The feedback from the above pre-application consultations with Cork City Council informed the revised design of the proposed development which was submitted to An Bord Pleanála for discussion at a statutory Stage 1 tripartite pre-application consultation. The revised proposal provided for a scheme which consisted of 706no. residential units residential dwellings (656no. apartments and 50no. townhouse apartments, to include 240no. 1-bed dwellings; 383no. 2-bed dwellings; 72no. 3-bed dwellings; and 11no. 4-bed dwellings) and ancillary facilities arranged in 9no. buildings (Buildings A, B, C, E, F, G, H, J and K) varying in height from 3 to 15 floors. An Bord Pleanála's minutes of the Stage 1 pre-application consultation are included in Appendix C of this report.

The Stage 1 pre-application consultation was held remotely on Microsoft Teams between An Bord Pleanála, Cork City Council, and Watfore Limited and their design team on 7th October 2021.

In Attendance:		
An Bord Pleanála	Cork City Council	Watfore Limited and Design Team
Rachel Kenny (Director of Planning) RK Fiona Fair (Senior Planning Inspector) FF	Gwen Jordan (Planning) GJ Mary Doyle (Planning) MD	Niall Sheehan (Watfore Limited) NS Tony Reddy (Architect) TR

Helen Keane (Administration) HeK	Hugh Killen (Planning) HK Tony Duggan (City Architect) TD Gillian O'Sullivan (Engineering) GOS Simon Lyons (Engineering) SL	Paul Duggan (Architect) PD Aiden O'Neill (Planning Consultant) AON Naomi Dowds (Planning Consultant) ND Stephen Ginn (Engineer) SG Simon van Jaarsveld (Engineer) SvJ Jim Kelly (Landscape Architect) JK
----------------------------------	--	---

Table 9. Attendees at Section 247 Pre-Application Consultation held remotely on 7th October 2021.

The agenda followed during the October pre-application consultation was as follows:

1. Compliance with CDP Policy
 - Integration with the wider area
 - Density / Plot Ratio
 - Height Strategy & Visual Impact
 - Housing Typology / BTR
2. Issue of Primary Care Centre
3. Infrastructure services (Surface Water, Flooding, Irish Water, Transportation & Connectivity).
4. Residential Amenity
 - Daylight and Overshadowing
 - Outdoor Amenity Space
 - Resident support services & facilities
5. Open Space and Landscaping
6. Issues Raised in the CE Report
7. AOB

A copy of the record of this consultation as well as copies of An Bord Pleanála's Inspector's Report, Opinion and Direction are included in Appendix C of this report. Watfore Limited's response to An Bord Pleanála's Opinion is summarised in the Statement of Response to An Bord Pleanála Opinion prepared by Coakley O'Neill Town Planning Ltd., copies of which accompany the planning application.

On foot of the tripartite meeting of 7th October, 2021, a further consultation with Cork City Council took place on 18th October, 2021 via Teams to discuss revised proposals to include a reduced density and increased typology at the southern end of the site.

Cork City Council planners **welcomed the proposed scheme on foot of the proposed revisions, including the reduced numbers and increased typology, and that the scheme has evolved in a very positive way.** It was considered that **the proposal has the potential to be a significant catalyst for the area, and a place where people will want to visit for the range of services including the primary care centre.** The City Architect had commented that **the scheme had very satisfactorily responded to the request for a revision to the southern end of the site.**

The proposals now presented with this application are premised on this clear advice from Cork City Council.

5.0 Proposed Development

5.1 Vision

As noted in the accompanying architect's Design Statement prepared by Reddy Architecture and Urbanism, the key objectives for the proposed development are as follows:

- The regeneration of the Kinsale Road area with a range of active residential/ retail ground and first floor units.
- A Primary Care Centre (subject to a separate application) to serve the local population, designed to HSE requirements using existing site entrance to Tramore Road with independent below deck parking.
- The provision of a significantly enhanced urban edge onto Kinsale & Tramore Roads, including a new landscaped buffer zone and new vehicular site entrance at the existing signalised junction between Kinsale Road and Mick Barry Road.
- 15 Storey Landmark Building to designate the location.
- The provision of a number of significant new south-facing landscaped courtyard spaces at the heart of the development, plus additional landscaped pedestrian and cycle green links.
- Improved connectivity between the site and facilities such as the Black Ash Park and Ride, which has capacity to cater for additional passengers.
- The realisation of a sustainable inner suburban neighbourhood underpinned by a high level of sustainable transport use supported by ample bicycle parking provision on site and the fact that the site is located within 15 minutes' walk of a total of six existing bus services, all of which have capacity to cater for additional passengers.
- Crèche Facility, Gym, Community Hub facility, Retail Unit, Café/Restaurant, and Coffee Kiosk.

The vision for the proposed development is for it to function as the catalyst for the regeneration of the Kinsale Road area as a vibrant centre for residential accommodation, restaurants, bars, and other commercial uses in addition to the existing services and employment, all in line with national, regional and local policies, and:

- To deliver a 'best-in-class' residential apartment scheme for the Kinsale Road.
- Provide attractive, modern living accommodation.
- Provide a Primary Care Centre to serve the local population with pharmacy (subject to a separate application)
- Provide sustainability best practice in terms of design and construction (Part L and NZEB compliance). The sustainability vision is to create spaces that deliver Net Positive Impacts economically, socially and environmentally.
- Provide an appropriately scaled urban development to act as the basis for a new architectural idiom for the urban regeneration of the Kinsale & Tramore Road areas.
- To meet with the requirements of National Planning Policy as envisaged in the National Planning Framework 2040.

5.2 Description

Watfore Limited are making this application to An Bord Pleanála for planning permission for a SHD at the former CMP Dairies site, Kinsale Road and Tramore Road, Cork. The proposed development, with a total gross floor area of 60,833.7m², will consist of:

- a) The construction of 609no. residential dwellings (561no. apartments and 48no. townhouse apartments, to include 189no. 1-bed dwellings; 338no. 2-bed dwellings; 48no. 3-bed dwellings; and 34no. 4-bed dwellings) and ancillary facilities arranged in 11no. residential buildings (Buildings B, C, E, F, G, H, I, J, L, M, and N) varying in height from 3 to 15 floors.
- b) Of the 609no. dwellings, all of the dwellings proposed in Buildings E and F will consist of Build To Rent apartments i.e. 257no. apartments (78no. 1-bed; 142no. 2-bed; and 37no. 3 bed).
- c) Buildings E and F also include commercial and community facilities at ground level: a 289m² crèche with ancillary outdoor play area; a 547.5m² community hub facility; a 550m² gym; a 218m² retail unit; and a 272m² café. A twelfth building, a single storey 100m² coffee kiosk, is also proposed at the south-western corner of the town square.
- d) The provision of internal and external amenities for residents and private, communal and public open space/landscaped areas to include: balconies at all levels; a town square; garden court; meadow parks; equipped children’s play areas; a linear park along Kinsale Road; and roof terraces.
- e) 209no. shared car parking spaces (including EV charging points) (147no. undercroft spaces and 62no. surface spaces) and 1,145no. bicycle parking spaces (provided within 7 no. dedicated internal and covered external cycle stores).
- f) The provision of 1no. new primary access off Kinsale Road at the junction with Mick Barry Road, upgrades to that junction, an upgrade to the existing access from Tramore Road, and internal roads through the site, as well as pedestrian access points, shared surfaces, pedestrian walkways and cycle paths throughout the site, and
- g) All associated ancillary development works, including: hard and soft landscaping; boundary treatments; waste storage; plant, including 6no. ESB substations; signage; public lighting; and drainage works.

The height and unit mix of each of the buildings is set out as follows:

Building	Height	Unit Mix	
B	7 storeys (6 over ground floor, with basement level consisting of 115m ² plant)	Standard Apartments	
		1 bed	42
		2 bed	48
		3 bed	
		4 bed	
		Total:	90
C	9 storeys (8 over ground floor)	Standard Apartments	
		1 bed	33
		2 bed	79
		3 bed	
		4 bed	
		Total:	116
G	3 storeys (2 over ground floor)	Standard Apartments	
		1 bed	
		2 bed	5

		3 bed	
		4 bed	
		Townhouse Apartments	
		1 bed	
		2 bed	
		3 bed	
		4 bed	5
		Total:	10
H	3 storeys (2 over ground floor)	Standard Apartments	
		1 bed	
		2 bed	4
		3 bed	
		4 bed	
		Townhouse Apartments	
		1 bed	
		2 bed	
		3 bed	
		4 bed	4
		Total:	8
I	3 storeys (2 over ground floor)	Standard Apartments	
		1 bed	
		2 bed	4
		3 bed	
		4 bed	
		Townhouse Apartments	
		1 bed	
		2 bed	
		3 bed	
		4 bed	4
		Total:	8
J	6 storeys (5 over ground floor, with basement level consisting of 55m ² plant)	Standard Apartments	
		1 bed	24
		2 bed	23
		3 bed	8
		4 bed	
		Townhouse Apartments	
		1 bed	1
		2 bed	10
		3 bed	3
		4 bed	
		Total:	69
L	3 storeys (2 over ground floor)	Standard Apartments	
		1 bed	
		2 bed	9
		3 bed	
		4 bed	
		Townhouse Apartments	

		1 bed	
		2 bed	
		3 bed	
		4 bed	9
		Total:	18
M	3 storeys (2 over ground floor)	Standard Apartments	
		1 bed	
		2 bed	3
		3 bed	
		4 bed	
		Townhouse Apartments	
		1 bed	
		2 bed	
		3 bed	
		4 bed	3
		Total:	6
N	4 storeys (3 over ground floor, with basement level consisting of 30m ² plant)	Standard Apartments	
		1 bed	7
		2 bed	11
		3 bed	
		4 bed	
		Townhouse Apartments	
		1 bed	
		2 bed	
		3 bed	
		4 bed	9
		Total:	27
E (BTR)	6/8-15 storeys over 1no. undercroft level (5-14 storeys over ground floor)	Standard Apartments	
		1 bed	21
		2 bed	73
		3 bed	21
		4 bed	
		Total:	115
F (BTR)	6-8 storeys (5-7 storeys over ground floor, with basement level consisting of 295m ² plant)	Standard Apartments	
		1 bed	57
		2 bed	69
		3 bed	16
		4 bed	
		Total:	142
		Grand Total:	609

Table 10. Proposed Residential Buildings

The principal development statistics are as follows:

Development Statistic	Proposed Development
Site Area	3.39ha (33,900m ²)

No. of Dwellings	609no. dwellings (561no. apartments and 48no. townhouse apartments: 189no. 1-bed dwellings; 338no. 2-bed dwellings; 48no. 3-bed dwellings; and 34no. 4-bed dwellings)
No. of Build to Rent Apartments	Of the 609no. apartments, 257no. are Build To Rent apartments (78no. 1 bed; 142no. 2 bed; and 37no. 3 bed)
Gross Floor Area	60,833.7m ² , to include: <ul style="list-style-type: none"> • 57,923m² residential uses • 1,429m² total creche (63no. child places), gym, café, coffee kiosk and retail uses • 1,531m² ancillary uses (Excludes 1-level under croft car park and plant below Buildings B, F, J and N)
Resident Services and Amenities	926m ² , to include: <ul style="list-style-type: none"> • Bike Store 01, Building F 117m² • Bike Store 02, Building F 51m² • Refuse Store, Building B 19.5m² • Refuse Store, Building C 45m² • Refuse Store, Building E 19m² • Refuse Store 01, Building F 48m² • Refuse Store 02, Building F 57m² • Refuse Store, Building L 22m² • Community, Building F 547.5m², with Staff Room (17m²); WC Facilities (40m²) Community Lounge/Town Hall Events room (329m²); Co-Working Lounge/Business Centre (78m²); and Cinema/Media Presentation Room (83.5m²)
Resident External Amenity Space	7,865m ² (23%) ground floor level public open space, to include: Town Square: 3,025m ² Garden Court; 1,650m ² Upper Meadow Park: 1,350m ² Lower Meadow Park: 1,840m ² In addition: Roof Terraces of Buildings E and F: 598m ²
Additional Amenities (for Residents and the general public)	1429m ² (creche, gym, café, coffee kiosk and retail use)
Part V	122no. units, to include 50no. 1 bed units; 60no. 2 bed units and 12no. 3 bed units (See Table 13 below)
Plot Ratio	1:1.8
Site Coverage	26%
Residential Density	180 units/ha
Building Height	1 to 15 storeys (including ground floor)
Aspect	68% of residential units (412no.) benefit from dual aspect
Private Open Space	All of the residential units have individual private open space in accordance with the standards set out in the Apartment Guidelines, 2020

Storage Space	All of the residential units have individual storage space in accordance with the standards set out in the Apartment Guidelines, 2020
Cycle Spaces	1,145no. cycle spaces are proposed
Car Spaces	209no. spaces (147no. under croft spaces and 62no. surface spaces)

Table 11. Proposed Development Statistics

The units proposed to satisfy Part V social and affordable housing obligations are as follows:

Block	1 bed		2 bed		3 bed		Total
B	Type A1 (48m2) Nos. B02, B10, B15, B23, B36, B41, B54, B62, B75, and B88	10	Type B (78.8m2) Nos. B11, B22, B24, B35, B48, B61, B74, and B89	8			18
C	Type A2 (50m2) Nos. C03, C15, C28, C41, C54, C67, C80, C93, C96 C106 and C109	11	Type B (78.8m2) Nos. C09, C24, C35, C48, C61, C63, C74, C76, C87, C100, C102, and C113	12			23
E	Type A1 (48m2) Nos. E03, E15, E22, E27, E34, E39, E51, E63, E73, and E78	10	Type A (73m2) Nos. E71, E86, E91, E101, and E111 Type B (78.8m2) Nos. E02, E14, E26, E38 and E50 Type B1 (88.8m2) Nos. E82, E97, and E107	13	Type A (95.5m2) No. E12, E48, E60, E70 and E80	5	28
F	Type A1 (48m2) Nos. F02, F10, F13, F25, F29, F32, F44, F49, F51, F63, F67, F70, F82, F86, and F89	15	Type B (78.8m2) Nos. F17, F19, F36, F38, F55, F57, F74, F76, F93, and F99	10	Type A (95.5m2) Nos. F15, F110, and F123	3	28
G			2-bed ground floor apartment (81m2) Nos. DG01 and DG03	2			2
H			2-bed ground floor apartment (81m2) Nos. DH01 and DH03	2			2
J	Type A1 (48m2) Nos. J20, J33, J46 and J59	4	Type B (78.8m2) Nos. J19, J21, J32, J34, J45, and J58	6	Type A (95.5m2) Nos. J30, J43, J56 and J69	4	14
I			2-bed ground floor apartment (81m2)	2			2

			Nos. DI01 and DI03				
L			2-bed ground floor apartment (81m2)	2			2
			Nos. DL01 and DL05				
M			2-bed ground floor apartment (81m2)	1			1
			Nos. DM01				
N			2-bed ground floor apartment (81m2)	2			2
			Nos. DN01 and DN03				
TOTAL		50		60		12	122

Table 12. Proposed Part V

A Planning Support Report prepared by Savills Ireland is included with this planning application, the key points of which are as follows:

- The private rented sector in Cork City accounts for 26% of households, a significantly larger proportion than across Ireland as a whole (18%).
- During 2011-2016, the proportion of private renters in Cork increased faster than the national average at 2.1% compared with 1.4%, with over 260 new private rented households created in the City over the last five years. This increase is creating demand for, and putting pressure on, appropriate housing. According to the CSO, 62% of existing private rented households in Cork are aged under 35.
- There is clearly a huge opportunity to provide good quality PRS accommodation in Cork, given the increasing levels of demand, including existing and new international corporate renters investing in Cork and the students and private renters already in the city.
- It should be noted that renters are much more transient than owner occupiers and open to new areas, thus expanding the potential demand pool considerably. New international companies arriving in Cork and the planned opening of the new Cork University Business College in the City within the next five years will compound these trends.
- The Cork residential market has continued to see increased growth over the last number of years and this is due to an undersupply of stock to the market and an increase in demand. According to Daft.ie, from Q4 2020 to Q4 2021, Cork city rents rose by 6.3%, and showing a similar trend, rose by 1.0% from Q3 to Q4 2021. From the 9 year period from 2012 to 2021, an increase of 64% has been seen from an average rent of €797 to €1,539 per month. As of February 2022, there were only 39 properties listed to rent in Cork City, and a large quantum of these are of poor quality. This reflects a 27% decrease of stock from November 2021. When reviewing this figure for high quality, purpose built city schemes, the number reduces drastically. There are only 2 units available at The Elysian, none at City Square, none at Opera Lane, and 1 at Lancaster Gate.
- Ireland 2040 is targeting a population growth of 104,657 in the Cork Metropolitan area by 2031, with 75,000 of these persons within the City.

- It is expected that household sizes will fall from 2.7 in Cork City in 2016, to closer to the European average of 2.3 over the coming years. Seeing this reduction in household sizes, we would expect that there will be a requirement of 40,500 to 54,300 housing units in Cork City and suburbs over the next 20 years.
- When reviewing the projected influx of workers into the city as part of the completion of Grade A office space (please refer to Savill's Planning Support Report for more detail) alone, Savills project a requirement for 5,429 homes in the Metropolitan area. While it is a fair assumption that all of these workers will not be new to area, and will not have a housing demand, it will regardless put an additional strain on an already under supplied market as, although several residential schemes pdf scale have been granted planning permission in Cork, none of these have been constructed as of yet.
- The South West Suburbs, where the site of the proposed development is located, contain both of Cork's major third level institutions, UCC and MTU, as well as other major public institutions such as Cork University Hospital. There will therefore likely be continued demand for private rented accommodation in particular in the area as well as for purpose built student accommodation.
- Some key statistics of the Cork City occupier market are as follows:
 - 26% of the population are within private rented accommodation – 8% above the state average
 - 61% of the city population are living within a two person household or less – 9% above the state average
 - 19% of the population are living within apartments – 7% above the state average
 - 70% of the population have a commute time of less than 30 minutes – 9% above the state average.
- The combination of the above statistics demonstrates an appetite within the Cork market for apartment living, and the lack of development within the sector coupled with a population growth will see pressure continue on the sector and a continued increase in residential rents.
- The proposed development site is located on the outskirts of Cork City approximately 2 kilometres south of the City Centre and within a 30-40 minute walk time. This proximity will allow for the development to fit into the 15 Minute City" principle, following the approach taken in cities such as Melbourne, Barcelona and Paris, with the aim being to enhance both quality of life and sustainability The principle allows for reduced congestion and pollution, enhanced public spaces, and benefits to the local economy by way of creating neighbourhoods within 15 minutes proximity of the City Core The development will be able to offer residents the balance of city living with suburban amenities, both within the development and within the immediate environs.
- Unlike many other schemes proposed, the proposed development offers the potential to act as a lifecycle development with a considered proportion of one, two, and three bedroom apartments, and townhouses in addition to attractive public open space.

The proposed development is to be phased as follows:

Phase	Description	Timeline
Pre-Development Site Enabling Works	Site Enabling Works	Commencement 2022 (2-4 months to complete)
1	Site Development Works Buildings E and F (Build To Rent) and Public realm works (Primary Care Centre, subject to a separate planning application)	Commencement 2022 Completion 2025 (2.5 – 3.5 years to complete)
2	Site Development Works Buildings G and C Public realm works	Commencement 2025 Completion 2027 (2 – 2.5 years to complete)
3	Site Development Works Buildings J, H and B Public Realm Works	Commencement 2027 Completion 2029 (2.5 – 3.5 years to complete)
4	Site Development Works Buildings A and K Public realm works	Commencement 2029 Completion 2031 (1.5 – 2.5 years to complete)

Table 13. Proposed phasing (indicative).

5.3 Services

There are existing power and telecoms utilities on site that previously served the Dairygold Milk Distribution Centre. These are assumed to be redundant. In relation to water services, the following is proposed:

- Foul Water Services:**

It is proposed to construct a dedicated below ground foul network to collect and convey all foul water generated by the development. Foul water flows generated on site are expected to be as follows:

	Average Discharge	Peak Discharge (based on a peaking factor of 6)
Building E		
Residential	0.89 l/s	5.34 l/s
Non-residential	0.09 l/s	0.54 l/s
Combined	0.98 l/s	5.88 l/s
Remainder of the proposed development		
Residential	3.82 l/s	22.92 l/s
Non-residential	0.08 l/s	0.48 l/s
Combined	3.90 l/s	23.4 l/s

Table 14. Estimated foul water discharge rates.

There is an existing 600mm diameter combined sewer crossing the site from west to east. It is proposed to divert this sewer in order to accommodate the proposed building/site layout.

It is proposed to discharge all foul water from Building E via gravity to the diverted combined sewer. The remaining buildings to the south cannot discharge to the combined sewer via gravity due to the topography of the site. As a result, it is proposed to discharge foul runoff from the majority of the site to a centrally located Pumping Station (PS). A rising main from the PS will discharge to the combined sewer.

It is intended the PS will be taken in charge by Irish Water. As the PS will be located adjacent to public amenity areas the design coordinates the PS with the surrounding landscaping to reduce any potential impact on residential amenity. Please refer to the Site Infrastructure Report prepared by Arup for further details.

A pre-connection enquiry has been submitted to Irish Water and they have issued a Confirmation of Feasibility Letter (reference CDS20008019, dated the 25th of January 2021, included as an appendix in Arup's Site Infrastructure Report) confirming they have capacity within their network to serve the development without upgrade.

- **Potable Water Services:**

Water demands due to the proposed development are expected to be as follows:

- Residential -150 l/person/day as per Irish Water Code of Practice
- Retail/Commercial - 300 l/100m²/day

It is proposed to provide a new connection from the existing watermain located in Kinsale Road. A bulk water meter will be provided immediately downstream of the 2 No. connections to the existing Irish Water watermain. Downstream of the bulk water meter a series of ring mains will be provided on site from which each development building will be fed. The metering strategy for the development will be as follows:

- For supply to high rise buildings with multiple apartments a below ground meter will be provided outside the building to allow for metering of the entire building and a water meter room is allowed for within the building to allow for metering of individual units.
- For supply to individual units (e.g. apartments with townhouse overhead as per Building L and retail/cafe units) a below ground meter will be provided outside the building.

External fire hydrants will be connected to the ring mains on site. The location/number of fire hydrants shall be confirmed during the fire certification stage.

A pre-connection enquiry has been submitted to Irish Water and they have issued a Confirmation of Feasibility Letter (reference CDS20008019, dated the 25th of January 2021, included as an appendix in Arup's Site Infrastructure Report) confirming they have capacity within their network to serve the development without upgrade.

- **Surface Water:**

It is proposed to construct a new dedicated surface water system to serve the proposed development. The intention is to discharge surface water off site to the south to an existing surface water pipework located within Kinsale Road. This surface water pipe ultimately outfalls to the Tramore River nearby. A CCTV survey of this pipe was carried out (see Appendix F of the Arup's Site Infrastructure Report) which indicates a blockage along the existing pipework upstream of the outfall.

From discussions with Cork City Council, it is understood that the existing gullies in the vicinity of the pipework may not be adequately connected to the existing pipework. As part of the proposed works the pipe blockage will be remedied and the existing gullies will be connected to the pipework.

The existing site is predominantly impermeable, and it is expected any existing positive drainage system on site is in a poor state of repair. The site falls from north to south and the section of site immediately inside the southern boundary appears to have ponding water. The proposed surface water strategy aims to greatly reduce the discharge rates by restricting run-off from site to a QBAR Greenfield Runoff rate of 3.17 ls/ha. Attenuation will be provided to cater for those instances where the runoff generated on site exceeds the restricted run-off rate. The surface water network has been modelled to assess potential attenuation volume requirements. Attenuation will be sized to cater for storms up to and including the 1 in 100-year event + 10% allowance for climate change.

Attenuation/SuDS measures will be provided as follows:

- 4no. below ground geocellular storage will be located beneath public realm areas/the undercroft car park.
- Permeable paving will be provided to car parking areas. Runoff from adjacent sealed hardstanding areas will be directed to drain towards the permeable paving areas.
- Soft landscaping/tree planters. Runoff from adjacent sealed hardstanding areas will be directed to drain towards soft landscaping areas.
- 2 no. green roofs in the form of the rooftop gardens on Buildings E and F.

5.4 Mechanical and Electrical Building Services

In relation to sustainable energy, as set out in the Energy Statement prepared by EDC which accompanies this application, the following have been incorporated into the proposed development:

- Suitable performance criteria have been specified for the building fabric, reducing heat loss.
- Regarding passive solar shading, external shading in the form of window reveals and overhangs, and solar performance glazing will be incorporated into the façade design to assist in the reduction of overheating.
- Sunlight will be used where possible to reduce the need for heating on cold days, such as in winter when the sun cast is lower. This resource will be harnessed by allowing sunlight enter the buildings to areas with high thermal mass such as exposed concrete.
- To maximise the use of natural daylight throughout the proposed development in order to reduce energy consumption from artificial lighting, an integrated approach utilising a combination of building form, light wells, glazing systems and day-light responsive control systems will be implemented. All interior and exterior lighting are specified as being energy-efficient, reducing electrical power consumption. The design of lighting systems shall ensure that lighting is only used when required.
- Space heating to each apartment will either be provided by Exhaust Air Heat Pumps (EAHP), or by electric radiators using the Dimplex Electric system.
- Mechanical ventilation to each apartment will be provided either by EAHP or a Mechanical Ventilation Heat Recovery (MVHR) unit. High-efficiency heat recovery systems will be employed on appropriate air systems in order to minimise associated energy use.
- Domestic hot water to each apartment will be provided by EAHPs.

- Photo voltaic (PV) solar panels will be installed on the roofs of the residential buildings.

A public lighting design has been prepared by EDC and has been incorporated into the landscaping layout.

5.5 Landscape Design

A landscape design for the scheme has been prepared by CSR, which seeks to provide safe, distinctive and inspiring environments, building on the landscape heritage of the site as a former dairy, as well as referencing the history of the Mick Barry Road and the Cork Bandon and South Coast Railway.

The key design features include:

- Kinsale Road/Tramore Road Interface
- Boundary buffer treatments
- Spatial Hierarchy/Circulation/Connectivity through courtyards
- Town Square Public Realm
- Recreation & Amenity
- Biodiversity/Pollinator Planting
- Roof Gardens

The ground level open space is sequential, starting with the public town square in the north of the site, followed by a series of 3 no. semi-public open spaces in the form of a garden court and 2 no. meadow parks, each with amenity grass, formal and informal play and meeting spaces, and all interconnected with pathways which fully complement the highly permeable design of the proposed development overall.

There are currently 148 no. trees on site. 120 no. of these trees are categorised as being of low quality, or in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years, or are young trees (for more detail, please refer to the Landscape Design Rationale statement prepared by CSR, copies of which accompany this planning application).

In order to deliver an interactive and permeable urban edge to the street along the eastern, northern and southern boundaries and to accommodate the development footprint generally, all existing trees are proposed to be removed. To mitigate the loss of existing site vegetation, the proposed development includes a comprehensive tree and shrub planting strategy aimed at greening the site to enhance the biodiversity potential of the site in line with the All-Ireland Pollinator Plan, using a range native and high value non-native species throughout the development.

A total of 505 no. trees are proposed to be planted. Native woodland trees comprise some of the proposed planting. In addition, SUDS such as permeable paving, rain gardens, and the rooftop gardens on Buildings E and F have also been incorporated into the landscaping of the proposal. All of these measures will support biodiversity on site while providing amenity for residents and visitors to the site.

Please refer to the Landscape Masterplan, Site Sections, Landscape Design Rationale report, and Green Infrastructure and Amenity Plan prepared by Cunnane Stratton Reynolds for further details of the landscaping proposals for the proposed development.



Figure 14. Concept Landscape Masterplan (Source: Cunnane Stratton Reynolds, 2022).

6.0 Consistency with National and Regional Planning Policy

The key provisions of national and regional planning policy as they relate to the proposed development are set out in the following sections. The principal guiding international, national, and regional documents are listed below:

Project Ireland 2040 - National Planning Framework (2018)

Housing For All (2021)

Climate Action Plan (2021)

Urban Development and Building Height Guidelines (2018)

Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities (2020)

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

Urban Design Manual – A Best Practice Guide

Design Manual for Urban Roads and Streets (2019)

Guidelines for Planning Authorities on Childcare Facilities (2001)

Smarter Travel – A New Transport Policy for Ireland 2009-2020

The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)

The EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC)

Regional Spatial and Economic Strategy for the Southern Region (2020)

Cork Metropolitan Area Transport Strategy 2040 (2020)

Cork Cycle Network Plan (2017)

Cork City Development Plan 2015-2021

Draft Cork City Development Plan 2022-2028

In addition, there are two global issues relevant to the proposed development – climate change and COVID-19.

The detail of how the proposed development is consistent with national and regional planning policy is prefaced by a discussion of both of these themes.

6.1 Climate Change

According to the EPA, transport is the sector responsible for the largest proportion of Ireland's greenhouse gas (GHG) emissions, with the latter being the undisputed factor that is driving climate change. In response, since at

least 2010, climate change mitigation and adaptation measures have been a key element of planning legislation and policy in Ireland, with one of the core aims being to reduce GHG emissions by promoting sustainable, integrated settlement and transportation strategies.

In addition, climate change and biodiversity loss are interrelated. According to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), climate change is the third biggest driver of biodiversity loss. Biodiversity and green infrastructure can play a significant role in carbon sequestration.

In response to the above and in accordance with national, regional and local policy as well as best practice and the highest industry standards, the proposed development has been consciously designed to prioritise the reduction of GHG emissions (through encouraging modal shift, as well as proposing building energy efficiency) and the support of biodiversity (through the use of SuDS). The proposed development also includes a comprehensive tree and shrub planting strategy aimed at greening the site to enhance the biodiversity potential of the site in line with the All-Ireland Pollinator Plan by using a range of native and high value non-native species throughout the development).

6.2 COVID-19

In the context of climate change-driven efforts to lower our GHG emissions by densifying our urban settlements and increasing the patronage of public transport, slowing and containing the spread of COVID-19 presents challenges.

The World Health Organisation (WHO) recommends a Health in All Policies approach, which is:

an approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies and avoids harmful health impacts in order to improve populations health and health equity.

Architect, urban designer and academic Dr. Louis Rice is the Head of the WHO Collaborating Centre for Healthy Urban Environments and advocates for a “health in all designs” strategy. The COVID-19 crisis has created an increased urgency for this approach to be fully incorporated into urban planning policies and large-scale development proposals, and this can be achieved through, amongst other things, health-orientated urban design.

In response to the above, the site layout and siting, configuration and landscaping of the public and semi-public open spaces and public realm of the proposed development have been designed with health in mind in terms of permeability (which supports activity by means of ease of movement through the scheme) as well as physical distancing being possible to observe for users of the rooftop gardens, meadows, courtyards, public town square plaza, paved area along Tramore Road and landscaped buffer zone with separated footpaths and cycle paths along Kinsale Road.

6.3 Project Ireland 2040 – National Planning Framework (NPF) (2018)

The National Planning Framework (NPF), which forms part of Project Ireland 2040, is the national level statutory plan guiding land use and sustainable development in Ireland for the next two decades (Department of Housing, Local Government and Heritage, 2020).

The NPF is guided, in part, by the aim of achieving regional parity in the country by significantly growing the population of both the Southern Region and the Northern and Western Region over the next two decades, to counterbalance the dominance of the Greater Dublin Area.

In relation to Cork, the NPF sets a population growth target of at least 50-60% for Cork City and its suburbs by 2040. This is to facilitate Cork becoming a city of scale so that Cork can become competitive with Dublin, as well as with other comparable European and UK cities of similar scale.

These population growth projections equate to approximately 324,000 people living and working in the city and suburbs and will mean enabling the city to grow by twice as much to 2040 as it has over the past 25 years.

The preferred spatial development approach contained in the NPF is to provide as compact an urban environment as possible through the reuse of previously developed brownfield sites, the development of infill sites, and the redevelopment of existing underutilised sites.

Key future growth enablers for Cork outlined within the NPF includes the following:

- Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects. The proposed development site is one such enabler that will contribute to the future growth of Cork City in line with the NPF.

National Strategic Outcome (NSO) 1 “Compact Growth” of the NPF is aimed at consolidating and densifying future urban growth and development within existing settlements and their built-up footprints.

NSO 4 “Sustainable Mobility” is aimed at facilitating a move away from polluting and carbon intensive propulsion systems towards new technologies, as well as facilitating an increase in the patronage of public transport and supporting modal shift towards greater levels of walking and cycling as transport mode choices.

NSO 7 “Enhanced Amenity and Heritage” is focussed on enhancing recreational spaces and attractiveness in city and town centres to support a good quality of life. Well-designed public realm, which includes public spaces, parks and streets, and recreational infrastructure are key to achieving this NSO.

NSO 10 “Access to Quality Childcare, Education and Health Services” is prefaced on the fact that good access to a range of quality education and health services is key to creating attractive, successful, and competitive places.

NPF National Policy Objective (NPO) 1a is aimed at ensuring that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area (which contains the Greater Dublin Area) will be at least matched by that of the rest of the country. This NPO is informed by the concept of regional parity, where the targeted growth of the rest of the country up to 2040 should exceed that of the Eastern and Midland Region.

NPO 1b states that the Southern Region of the country is to have an additional 340,000 - 380,000 people, i.e. a population of almost 2 million by 2040.

In the context of Cork, NPO 2a translates to a target of half (50%) of future population and employment growth in Cork to be focused in Cork City and its suburbs.

Similarly, NPO 3b means that at least half (50%) of all new homes to be developed in Cork City and suburbs should be delivered within the built-up footprint of the city and its suburbs. This is to be facilitated through the Cork Metropolitan Area Strategic Plan (MASP).

NPO 4 aims to ensure the creation of attractive, liveable, well designed, high quality urban places for diverse, integrated communities, where a high quality of life and well-being can be enjoyed.

NPO 5 dictates that cities and towns should be developed to sufficient scale and quality to be able to compete internationally and to be drivers of national and regional growth, investment, and prosperity.

NPO 6 seeks the regeneration and rejuvenation of cities, towns and villages as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

NPO 11 is as follows:

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO 13 supports the relaxing of certain planning and related standards in urban areas, in particular building height and car parking, to achieve targeted growth, with these features being assessed in the context of well-designed high-quality outcomes, with the caveat that public safety is not compromised and the environment is suitably protected.

NPO 27 is aimed at ensuring the integration of safe and convenient alternatives to the car into the design of communities by prioritising walking and cycling accessibility.

NPO 32 is as follows:

To target the delivery of 550,000 additional households by 2040.

NPO 33 prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

NPO 35 is aimed at increasing residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

NPO 64 seeks to improve air quality and reduce pollution in our urban and rural areas through, amongst other measures, integrated land use and spatial planning that prioritise public transport, walking and cycling.

The proposed development aligns with the above NSO's and NPO's of the NPF in that it:

- is a high-density residential development on a vacant brownfield site within the existing footprint of Cork City;
- is located in close proximity to a public transport service that is currently underutilised as well as other existing bus services on which capacity has been identified in the documentation submitted with this planning application;
- is located along a planned strategic public transport corridor and existing and proposed cycle network;
- is in close proximity to high-quality public amenities;
- will contribute positively to the public realm along Kinsale Road, Tramore Road and Mick Barry Road;
- will provide high-quality public open space on site;
- will provide good access to a quality childcare facility on site.

6.4 Regional Spatial and Economic Strategy for the Southern Region (2020)

The Southern Regional Assembly was responsible for creating the Regional Spatial and Economic Strategy for the Southern Region (RSES), which came into effect on 31st January 2020. Included in the RSES for the Southern Region is the Cork Metropolitan Area Strategic Plan (MASP).

Regional Planning Objectives (RPO) 6-10 of the RSES relate to the MASPs for each of the three metropolitan areas of the Southern region – Cork, Limerick-Shannon and Waterford.

National and regional policy have assigned a heretofore unprecedented scale and rate of growth for Cork City in order to assist in counterbalancing the excessive growth and sprawl of Dublin. In order to achieve the ambitious regional growth targets set for Cork, it is paramount that proposals such as the subject proposed development of this report are facilitated through the planning process.

RPO 7 of the RSES is as follows:

“Delivery and Funding”

It is an objective to:

- Support sustainable delivery of the Strategic Investment Priorities identified by the NDP for the Cork, Limerick-Shannon and Waterford metropolitan areas and progress co-ordination between the principal stakeholders for delivery to achieve the vision and objectives identified in each MASP.*
- Promote the sustainable implementation of innovative, collaborative projects through the Urban Regeneration & Development, Rural Regeneration & Development, Climate Action, and Disruptive Technologies funds within the Cork, Limerick-Shannon and Waterford Metropolitan Areas.*

The basis of Project Ireland 2040 is that the spatial plans and investment plans of the NPF and the National Development Plan (NDP) must align to ensure the timely delivery of the investment required to provide the housing, jobs and infrastructure needed for both the present population and the projected increase in population of an additional 1 million people by 2040.

The *National Development Plan 2021-2030* (NDP) states that the NPF housing supply target has been revised “to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date” with the finding now being that there is “a need to accommodate around 600,000

new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030” (NDP, 2021, p.55).

The proposed development is consistent with RPO 7a of the RSES in the following senses. The first is NSO 4 of the NPF, “Sustainable Mobility”, which is supported by the strategic investment priorities outlined in Chapter 9 of the NDP. The site of the proposed development is located on an existing bus route between Cork City Centre and the Black Ash Park & Ride car park terminus. The Park & Ride (Route 213) bus operates at a high level of frequency, has capacity for additional patronage as the service is currently underutilised, and the terminus is only 4 minutes away from the subject site by foot. UCC students can avail of a free dedicated Park & Ride service to UCC from Black Ash also.

Other bus stops in close proximity to the proposed site are for bus services 203, 206, 219, 226 and 209A that are approximately 15 minutes away by foot, located to the north-west of the subject site. These existing bus services also have capacity for additional patronage, as is outlined in the Bus Capacity Assessment which has been prepared by Arup and is included as Appendix C of the accompanying Traffic and Transportation Assessment and Mobility Management Plan Statement. In addition, the eastern boundary of the subject site corresponds exactly with a priority BusConnects radial route, as identified in the Cork Metropolitan Area Transport Strategy 2040.

Furthermore, a mandatory cycle lane currently runs along the eastern boundary of the subject site (visible in Figures 12 and 13 above) and the site is currently within easy cycling distance (i.e. 8-25 minutes) of several significant employment, education, commerce and cultural hubs in Cork City: Cork City centre; UCC; CUH/Wilton Shopping Centre; Douglas village; Cork Airport Business Park; MTU Cork, and; Mahon Point.

The site context is extremely compatible with supporting future residents of and visitors to the proposed development to use sustainable modes of transport in terms of existing infrastructure, proximity to key locations in Cork City, and planned public transport strategies for Cork City as well as the modest levels of car parking provision that are proposed for the development, the ample levels of bicycle parking provision and improved pedestrian linkages between the subject site and Black Ash Park & Ride and, in time, Tramore Valley Park (subject to a separate proposal being progressed by Cork City Council).

In addition, it is envisaged that a car sharing company will have access to some car parking spaces located within the under-croft car park, the number of which is to be agreed at a later date. The introduction of these spaces will enable residents to have access to a car without the need to own a personal car. The provision of a car sharing scheme will support residents transport needs as well as helping to ensure that the proposed development supports sustainable transport modes of choice.

The second sense in which the proposed development is consistent with RPO 7a of the RSES is the way in which the proposed development aligns with Strategic Investment Priority No. 10 of the NDP, which is “Education, Health and Childcare” and which corresponds with National Strategic Outcome 10 of the NPF. This is achieved through the provision of a creche on site, as well as a Primary Care Centre (subject to a separate application). The site is also located approx. 600m north of the out-of-hours Southside SouthDoc GP facility as well as being within 2.5km of 19no. TUSLA-registered early years childcare facilities.

In addition, 18no. primary schools and 9no. post-primary schools are located within 2.5km of the site¹. The subject site is also within easy access of the following third level educational institutions: Coláiste Stiofáin Naofa; Cork College of Commerce; St. John’s Central College; Cork School of Music; Crawford College of Art and Design; UCC; and MTU Cork.

RPO 8 of the RSES is aimed at encouraging “Investment to Deliver on the Vision for Metropolitan Areas”. Part b. of RPO 8 states the following:

Prioritise the delivery of compact growth and sustainable mobility in accordance with NPF objectives.

The proposed development constitutes a residential density of 180 units/ha. This density facilitates the creation of a new, compact neighbourhood hub on a large vacant brownfield site that is located in close proximity to existing and planned public transport and cycling infrastructure. Clearly, the proposed development is exactly the kind of project whose delivery should be supported in order to satisfy RPO 8b.

Part c. of RPO 8 states the following:

Ensure the investment in and delivery of the Sustainable Place Framework within each MASP area, delivering quality of place attributes as an incentive to attract people to live, work and visit”.

RPO 8c refers to the “Sustainable Place Framework” of the RSES, which is also Goal 1 of the Cork MASP. This goal seeks:

- *Vibrant living and working city centre at the heart of a thriving metropolitan area and region.*
- *Social, physical and economic renewal of inner city neighbourhoods.*
- *Compact urban development, achieving brownfield and infill targets through innovative design approaches to appropriate density and height.*
- *Provision for diverse residential accommodation types to accommodate the needs of different groups in society including older age cohorts.*
- *Network of compact metropolitan settlements and employment areas offering quality residential and working choices, interconnected with sustainable public transport, pedestrian and cycling networks.*
- *A metropolitan area complemented by a network of connected regional settlements, fulfilling strong population and employment roles for their rural hinterlands.*

¹ 13no. primary schools and 6no. post-primary schools were recorded in the Social and Community Audit which accompanies this pre-planning SHD consultation application. This is owing to the fact that the catchment area defined in that audit corresponds with 20no. Electoral Divisions. However, a further 5no. primary schools and 3no. post-primary schools are located within a 2.5km distance from the subject site, as follows:

Primary School		Post-Primary School	
1.	Scoil Bhride Eglantine, Ballinlough.	1.	Ashton Secondary School, Blackrock Road.
2.	St. Anthony’s Boys Primary School, Ballinlough.	2.	Regina Mundi Secondary Girl’s School, Ballinlough.
3.	Rockboro Primary School, Boreenmanna Road.	3.	Christ King Secondary School, South Douglas Road.
4.	St. Luke’s National School, Douglas.		
5.	Scoil Nioclais Primary School, Grange.		

- *Enhancing the quality of our existing places through retrofitting a high standard of infrastructure, services and amenities that improve the liveability and quality of place in existing settlements and communities, especially locations that experienced significant new population growth in the past (such as metropolitan towns) and existing areas experiencing positive growth (such as city centre neighbourhoods).*
- *Achieve mixed use “five-minute” or “ten-minute” sustainable city and town models where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, access recreation and amenity inter alia.*
- *Seek infrastructure led development where housing and job provision is integrated with high standards in sustainable transport, social and community infrastructure, quality public realm, recreation and amenities.*
- *Targeted urban regeneration measures to address dereliction and underutilised lands, particularly in inner city and disadvantaged areas to provide improved environmental quality including street tree planting.*
- *Rejuvenation of our existing built assets and public realm.*
- *Protection and enhancement of the built and natural heritage and biodiversity.*
- *Working with/enhancing the amenities of the natural environment.*
- *Resilience to climate change and flooding.*

Clearly, the proposed development harmonises with this goal to a great extent. The proposed development is an urban regeneration project that will facilitate the delivery of a compact, high-density vibrant community on an underutilised, large brownfield site within a disadvantaged inner suburban neighbourhood in close proximity to existing public transport corridors. The addition of a high-density residential development to the area will provide more footfall along Kinsale Road in particular, which will increase business turnover within the vicinity, thus growing the local economy.

The inclusion of a tall building of excellent architectural design into the scheme will contribute to a unique sense of place at this entrance to Cork City and will serve as a focal point for the surrounding neighbourhoods. It also contributes to the evolving skyline of Cork City which is symptomatic of Cork becoming a living and working metropolitan city of scale.

Buildings B, C, E, F, J and N have lift access to the apartments for less able-bodied persons, and the 9no. 1-bed, wide deck-access apartments in Building N have been specifically designed for elderly residents. The proposed development is therefore an age-friendly one, where residents' needs can be accommodated over the period of their lifetimes with open and community spaces and services on site and access to excellent public transport. In addition, with 14% of the dwellings being 3- and 4-bedroomed, a diverse community atmosphere is guaranteed as the proposed development is suitable for families also.

The success of the proposed development is ensured by the fact that it is underpinned by the provision of high quality social and physical infrastructure, both in the wider area, as evidenced in the Social and Community Audit prepared by Coakley O'Neill Town Planning Ltd. which accompanies this planning application, as well as on site itself in the form of:

- a creche, gym, retail unit, café, and coffee kiosk;
- upgrades to the existing public realm along Kinsale Road regarding footpaths and to the existing cycle route, and the introduction of landscaped buffering which includes new tree planting;
- substantial bicycle parking provision and a series of landscaped, south-facing public and semi-public open spaces located in the centre of the scheme;

- the provision for improved pedestrian linkages to the Black Ash Park and Ride facility, an existing high frequency bus service currently underutilised and therefore with capacity;
- five other existing bus services within 15 minutes' walk of the site, all of which also have capacity to cater for additional passengers;
- improved pedestrian and cycling infrastructure;
- a high-frequency future public bus corridor along Kinsale Road;
- a "fifteen-minute" city model where the city centre, Douglas, Wilton and UCC are all within 15 minutes cycling time and where Cork Airport, MTU and Mahon are within 15 minutes of the proposed development by public transport.

SUDS have also been incorporated into the landscaping of the proposed development, including 4no. surface water attenuation tanks to be located underneath the public open spaces and the under-croft car park, as well as permeable paving, planting and 2 no. rooftop gardens on Buildings E and F. This will increase the ecological value of the scheme and ensure that the proposed development will not pose a flood risk in the event of heavy rainfall.

In addition, the ambition of the Cork MASP is based on the principles of the RSES Sustainable Place Framework, with the framework informing the following 14 guiding principles for investment and sustainable development in the Cork Metropolitan area:

- | | |
|--|--|
| <ul style="list-style-type: none"> • A Living City and Suburbs • Metropolitan Engine • Compact Sustainable Growth • Integrated Transport and Land Use • Accelerate Housing Delivery • Employment Density in the Right Place • Better alignment of Growth • Social Regeneration • Future Development Areas • Metropolitan Scale Amenities | <ul style="list-style-type: none"> • Enabling Infrastructure • Co-ordination and Active Land Management • Re-intensify Employment • Future strategic growth areas not to compromise the delivery of more sustainable regeneration and consolidation of existing more suitable strategic sites. |
|--|--|

The proposed development complements and supports 8 of these 14 guiding principles, and this is detailed in section 6.5 of this report.

RPO 9 "Holistic Approach to Delivering Infrastructure" states the following:

It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including [amongst others] ...green infrastructure...community and social...open space amenity...public realm.

While the proposed development is not an infrastructure package in itself, the proposed development will involve considerable upgrade of the public realm along approximately 320m of Kinsale Road, over 90m along Tramore and approximately 70m along Mick Barry Road via a new landscaped buffer zone along Kinsale Road that includes footpaths and cycle paths, and improved pedestrian connectivity between Kinsale Road and the Black Ash Park and

Ride facility, which is currently underutilised. The proposed development will also provide public open spaces for use by the general public.

In addition, the scheme will complement the delivery of significant social infrastructure in the form of a Primary Care Centre which is the subject of a separate application under the consideration of Cork City Council. The rationale for the separate proposal of the Primary Care Centre is that it will serve a catchment population of 42,573 (Census 2016) in the areas of Ballyphehane, Togher, Greenmount, The Lough, Turner's Cross, Frankfield and Grange. This population will also increase once the residential aspect of the proposed development is occupied. Within the HSE, this catchment area is known as "Community Healthcare Network 14, South Cork City", and is bounded by the N71 to the west and South Douglas Road to the east. Commercial floorspace limits in the legislation pertaining to SHDs precludes Watfore Limited from applying for the development of the proposed Primary Care Centre as part of the proposed SHD.

RPO 10 "Compact Growth in Metropolitan Areas" states the following:

- a. Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*
- b. Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP.*

The proposed development undoubtedly satisfies the aims of RPO 10a and 10b – the subject site of the proposed development is an unused, vacant brownfield site within the existing footprint of the southern inner suburbs of Cork City that will deliver 609 new homes within the Cork MASP area. The site is currently served by existing public transport and cycling infrastructure. The proposed development will also be served by the future priority public transport service of BusConnects as well as contributing to the upgrading and improving of the provision of cycling and walking infrastructure in the vicinity of the site.

RPO 31 "Sustainable Place Framework" is aimed at ensuring "*the development of quality places through integrated planning and consistently excellent design*". The proposed development is consistent with RPO 31 in the following ways:

- It complements 11 of the guiding principles of the Sustainable Place Framework.
- The predominance of brick as a façade treatment throughout the scheme amounts to a high quality, durable and aesthetically pleasing material appropriate for residential development.
- The architectural design of the individual buildings and the way they interact with each other and the public and semi-public open spaces to contribute to a coherent, unique scheme has been achieved by prioritising the residential amenity of future residents, creating a positive visual impact in the surrounding district and facilitating an active street edge along approx. 320m of the Kinsale Road. This has the potential to be a catalyst for future development along the Kinsale Road in the form of a boulevard.

- The landscaped semi-public courtyard garden, meadow parks, and the public town square plaza, with their variety of surface treatments, planting and interconnecting pathways, create a unique, varied and coherent sense of place and will be inviting. This will fulfil the vision for the proposed development to create a new focal point and local destination centre in an inner suburban area that has long been identified as being a candidate for urban regeneration.
- In addition, as has already been highlighted, sustainable modes of transport have been integrated into the design and siting of the proposed development, including the enhancing of pedestrian facilities along approximately 70m of Mick Barry Road to facilitate safe, easy connectivity to the Black Ash Park and Ride facility from Kinsale Road. As has been stated above in this report, the Black Ash Park and Ride facility is served by Route 213. In addition, there are five other bus routes within 15 minutes' walk of the proposed development – Routes 203, 206, 219, 226 and 209A. All six existing bus routes are currently running below capacity.

6.5 Cork Metropolitan Area Strategic Plan

The Cork MASP is a constituent part of the RSES and aligns with current national planning policy and objectives, including those contained in the NPF.

The proposed development supports the following strategic goals of the Cork MASP:

- Goal 1: Sustainable Place Framework
- Goal 2: Excellent Connectivity and Sustainable Mobility
- Goal 4: High Quality Environment and Quality of Life

The Cork MASP specifically identifies Tramore Road as being an “Example Regeneration Area” within Cork city. A core aim of the Cork MASP is for Cork city’s suburbs to be compact – the density of the proposed development will fully support this objective for the southern suburbs of Cork city.

The Cork MASP contains population growth targets for 2031 that are consistent with those in the NPF which are set for 2040. Section 5 of the Cork MASP states that the population of Cork City and Suburbs are to grow by 75,000 by the year 2031, with a target population of 283,669 for that year.

According to the CSO, the current average household size in Ireland is 2.75 (Census of Population 2016 - Profile 4 Households and Families). Applying this figure to the 2031 population growth target for Cork City, an additional approximately 27,270 homes will need to be provided in the city by that year.

Furthermore, if the realisation of that target number of additional homes is to be consistent with National Policy Objective 3b of the NPF, then at least 13,635 new homes will need to be developed within Cork City and Suburbs within the next decade. This goal requires delivery of residential development in Cork City on an unprecedented scale. The proposed development can be considered as a direct response to this new paradigm for Cork City in that, if granted permission, it would account for the provision of just over 4.4% of that target.

Cork MASP Policy Objective 2 seeks the delivery of 11 key points. The proposed development will contribute to the delivery of 5 of these key points. These 5 key points are:

- c. Seek investment to achieve regeneration and consolidation in the city suburbs and high quality architectural and urban design responses to enhance the uses of this waterfront and all urban quarters.*
- f. Seek to achieve High Quality Design to reflect a high-quality architectural building stock in all urban quarters.*
- g. Seek delivery of a network of large city parks and smaller green areas throughout the metropolitan area and inner-city areas.*
- h. Strengthen Social and Community Development*
- i. Support active regeneration initiatives that are ongoing, especially driven through the Local Economic Community Plan, Local Community Development Committee and RAPID initiatives.*

The subject site is located within one i.e. Togher/Mahon/Ballyphehane, of the four areas of Cork City previously identified by Cork City Council as being disadvantaged and requiring intervention through the Revitalising Areas through Planning, Investment and Development (RAPID) initiative.

The proposed development involves investment in the regeneration and bringing back into use of a significantly large, vacant brownfield site in Ballyphehane. The proposal involves high-quality architectural and urban design on a site of scale, as is evidenced in the plans and other particulars that accompany this planning application. The proposed development is an example of high-quality placemaking as, amongst other things, it embodies all of planning theorist Kevin Lynch’s “elements of a city” (The Image of the City, 1960) – edge, path, node, landmark and district. This will bring huge benefit to this inner suburban area, where a succession of local authority-built housing estates and architecturally utilitarian commercial and industrial buildings currently characterise the surrounding urban form. In fact, the vision for the proposed development is that, as a predominantly residential project of significant scale and quality, it will serve an additional function as the stimulation for the regeneration of the surrounding area.

In addition, the design of the scheme includes landscaped, green, south-facing semi-public open spaces which are linked together with pathways to the town square, a public plaza at the north of the site. These green spaces support a language of interconnected green open spaces within the Cork Metropolitan area and contribute to the green infrastructure network that the MASP envisages for the area.

The provision of a crèche facility, gym, community spaces, retail unit, coffee kiosk and café will also serve and bolster the social and community supports of not just the future residential population of the scheme itself but of the wider local population also.

In addition to being consistent with all of the Southern Regional Assembly’s MASP Regional Planning Objectives, complementing Cork MASP Strategic Goals 1, 2 and 4 and Cork MASP Policy Objective 2, the proposed development also supports 11 of the 14 guiding principles of the Cork MASP. This is detailed in Table 15 below.

Cork MASP Guiding Principle		The proposed development
A Living City and Suburbs	✓	The density, site layout and mix of uses will facilitate the realisation of a vibrant residential neighbourhood hub with a distinct and unique sense of place, that is open, welcoming and useful to the surrounding local population of Ballyphehane and may stimulate knock-on regeneration projects within the area.

Metropolitan Engine	✓	The proposed development will provide residential and health functions along a public transport corridor (BusConnects), contributing to Cork City operating as a well-functioning, socially inclusive and energising place. As the site is not adjacent to any sensitive wildlife sites of particular conservation interest, the proposed development will also ensure the natural asset that is Cork Harbour continues to be protected.
Compact Sustainable Growth	✓	609 no. residential units in conjunction with a creche, gym, retail unit, coffee kiosk and café on this 3.39ha brownfield site will contribute in a significant way to the consolidation of the south-central suburbs of Cork City and therefore towards achieving the target of providing at least 50% of new homes within the city's existing footprint.
Integrated Transport and Land Use	✓	<p>The Land Use and Transportation guiding principle of the Cork MASP states that "[s]ustainable higher densities must be delivered, especially at public transport nodal points." (RSES, p.40). The Cork MASP also states, "[t]he distribution of growth must follow a spatial hierarchy that underpins delivery of the CMATS." (RSES, p.40).</p> <p>The proposed development will deliver targeted residential growth of Cork City along the BusConnects corridor which is identified in the Cork Metropolitan Area Transport Strategy 2040.</p> <p>The subject site of the proposed development is also located on the existing route of the Black Ash Park and Ride bus service, the 213, and within walking distance of Cork City Bus Routes 203, 206, 209A, 219 and 226. All of these routes have capacity for additional patronage. The proposed development will enhance the pedestrian connectivity between the site and the Black Ash Park and Ride facility on Mick Barry Road.</p> <p>The subject site is also located on a primary urban cycling route as identified in the <i>Cork Cycle Network Plan (2017)</i>. An on-street cycle lane currently runs along the site's eastern boundary. This cycle lane will undergo improvements as part of the landscaped buffer that is proposed between the scheme and the Kinsale Road.</p>
Accelerate Housing Delivery	✓	The predominantly residential nature of the proposed development, along with its scale, height, high-density and siting at this particular location, amounts to the activation of a strategic residential development within the existing footprint and suburbs of Cork City.
Employment Density in the Right Places	✓	The creche, retail, gym, coffee kiosk and café uses, as well as the tenancy management aspect of the proposed development, will re-intensify employment in this inner suburban location of Cork City.
Better Alignment of Growth	✓	In facilitating a significant increase in the local residential population, the proposed development constitutes a 'catch up' investment that will complement the existing employment, infrastructure, amenity provision and sustainable transport uses and facilities in the local area, as well as supporting the further development and improvement of these facilities.
Social Regeneration	✓	<p>The subject site is located within the Togher/Mahon/Ballyphehane area that has been identified by Cork City Council as being disadvantaged and requiring intervention through the RAPID initiative.</p> <p>Improving the urban environment and increasing the provision of childcare facilities are all considered principles of the Cork City's RAPID initiative and the proposed development supports the realisation of these - the proposed development involves the regeneration of a significant large vacant</p>

		<p>brownfield site, currently surrounded by security fencing and mature hedging, at a prominent location on a crossroads at the brow of a hill.</p> <p>It is expected that, subject to a separate application, the subject site will also provide the new and existing local residential population with a Primary Care Centre, a healthcare facility that has been identified by the HSE as being required in the local area. This use would also align with Cork City Council's RAPID initiative.</p>
Future Development Areas		n/a
Metropolitan Scale Amenities	✓	<p><i>"Tramore Valley Park looks magnificent today and is a continuing work in progress"</i> - Lord Mayor, Cllr Mick Finn on the opening day, May 2019.</p> <p>The scale and residential nature of the proposed development may support the realisation of further improvements to the public realm required at Tramore Valley Park by facilitating a critical mass of potential visitors to the park, which is likely to elevate the priority of carrying out the improvements.</p>
Enabling Infrastructure	✓	<p>The proposed development improves sustainability in terms of energy, waste management, resource efficiency and water conservation in the following ways:</p> <ul style="list-style-type: none"> • 6 no. dedicated waste storage facilities are provided for residents and commercial tenants in the under-croft car park, the ground floors of Buildings B, C, and F, and externally to the west of Building L. Once separated and stored in segregated bins by the residential and commercial tenants, a licenced waste collector will collect the residual, dry mixed recyclable, organic and glass waste on a twice weekly basis. • SuDS (including 4no. surface water attenuation tanks) have been incorporated into the landscaping approach to ensure water quality and local biodiversity is safeguarded. • The high residential density comprises smaller units than traditional lower density housing, and therefore will require less energy to heat. As detailed in EDC's Energy Statement, which accompanies this application, Exhaust Air Heat Pumps will be used throughout the scheme to heat spaces as well as domestic water. • Best practice fabric U-values and air tightness standards will be implemented in order to minimise heat flow/loss through the building envelope. • Passive solar principles have informed the design and external shading – in the form of window reveals and overhangs, and solar performance glazing – will be incorporated into the façade design to assist in the reduction of overheating. Meanwhile, passive solar heat gain will be harnessed by allowing sunlight to enter the buildings at areas with high thermal mass such as exposed concrete. • The close proximity of the multi-storey buildings to each other makes renewables-based systems of energy distribution, such as district heating, or area-wide technology upgrades, more feasible in the future. • PV solar panels will be installed on the roofs of all of the residential buildings. • The landscaped buffer zone between Buildings E, F, J and N and Kinsale Road, and Buildings D (subject to a separate planning application) and E along Tramore Road will amount to a great improvement on what is currently the case along the boundaries of the site with Tramore Road

		and Kinsale Road and this will encourage and support increased pedestrian activity in the area.
Co-ordination and Active Land Management	✓	The proposed development should be recognised for the fact that it amounts to the active urban development of a strategically located, large, vacant, under-utilised brownfield site in an immediate context that is zoned primarily for light industrial and retail warehousing uses but which is, in reality, a mixed-use environment bounded by extensive established residential neighbourhoods.
Re-intensify Employment		n/a
Future Strategic Growth Areas to Complement Cork MASP		n/a

Table 15. Consistency of the proposed development with the Cork MASP Guiding Principles.

6.6 Cork Metropolitan Area Transport Strategy 2040 (2020)

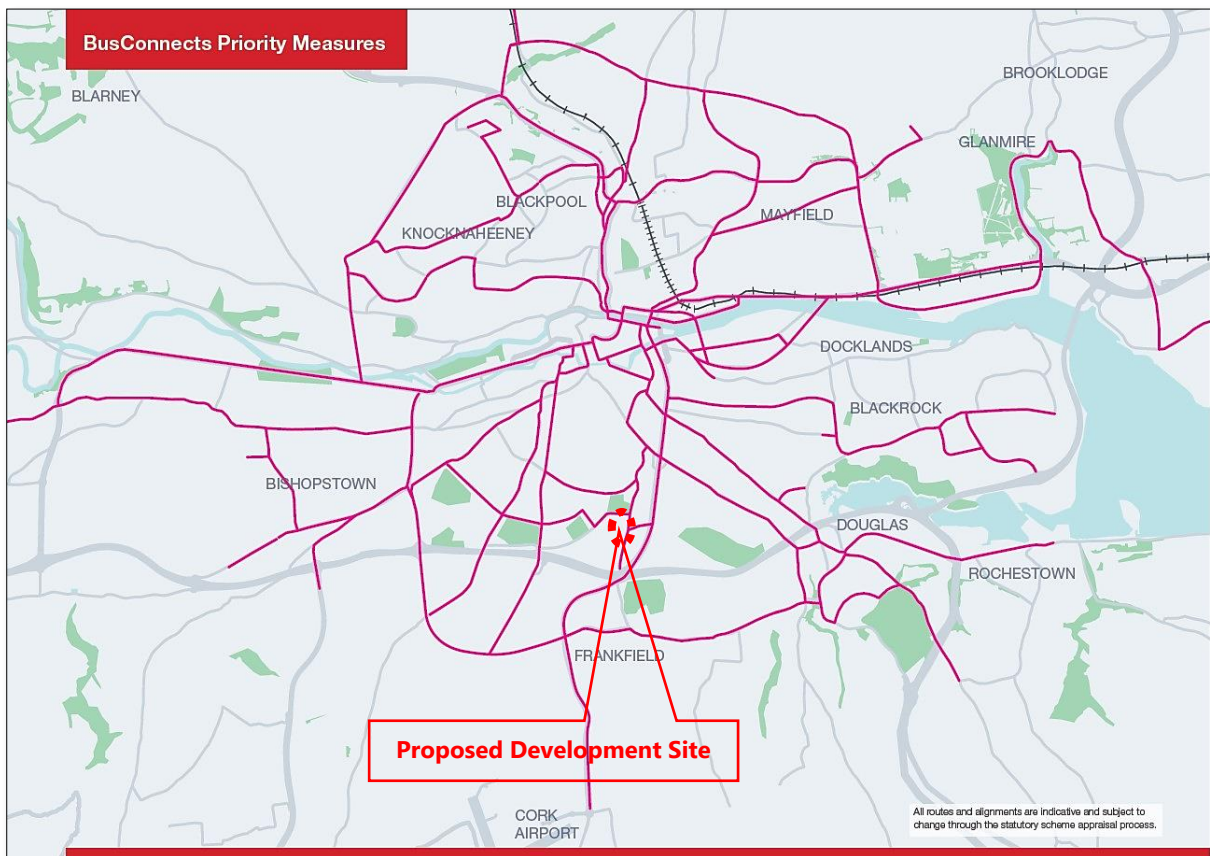


Figure 15. The Cork Metropolitan Area BusConnects priority routes as identified in CMATS. Location of subject site generally indicated in red. (Source: CMATS, 2020; Annotated by Coakley O'Neill Town Planning Ltd. 2021).

The Cork Metropolitan Area Transport Strategy 2040 (CMATS) was devised and published in 2020 in response to the policies contained in the NPF which envisage that Cork will become the fastest-growing city region in Ireland with a projected 50%-60% increase of its population in the period up to 2040. This population growth will see a commensurate increase in travel demand across the metropolitan area.

In terms of land use, some of the priorities of CMATS include the following:

- Targeting higher development densities in areas where opportunities exist for sustainable transport provision and in a manner that better aligns the provision of transport with demand
- Availing of existing transportation infrastructure, nearby amenities and facilities to deliver a critical mass of growth in population and employment which can support the transition and sequencing of investment to higher capacity public transport infrastructure and services; and
- The provision and design of new development in locations, layouts and at densities which prioritise walking and cycling and enable the efficient provision of public transport services.

CMATS proposes that an improved bus network will carry around 45 million passengers per annum and 32,000 passengers during the AM morning peak period in the Cork Metropolitan Area. In total, the network will comprise 200km of cross-city bus routes, 50km of orbital routes and 150km of radial routes.

The eastern boundary of the subject site comprises a section of a future public transport BusConnects radial route – Frankfield to Fairhill (also referred to as the Airport to City Centre route and Route 9) that has been identified in CMATS as a priority measure of the strategy. Specialists have been appointed by the NTA to carry out route determination and finalise the routes. This process is expected to be completed by early 2022.

The proposed development will increase the population living along this priority BusConnects radial routes, which will expedite the delivery of this strategic metropolitan public transport service.

CMATS is informed by guidance in the NPF that *“there should generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs”*.

The strategic location of the proposed development site along and in proximity to existing and planned sustainable transportation infrastructure supports the reduced level of car parking provision on site compared with development plan car parking standards which pre-date CMATS.

CMATS proposes the enhancement of the provision of park and ride facilities in the Cork Metropolitan Area as a solution to car parking demand in Cork City and aims to maximise public transport patronage. The strategy notes that the Black Ash Park and Ride facility, located in the vicinity of the subject site, currently operates below capacity, as do the five other bus routes within a 15 minute walk of the site of the proposed development.

CMATS states that such facilities, including the existing one at Black Ash, will require *“quality local walking and cycling networks to support safe and reliable interchange services and adjoining employment and residential uses”*.

The proposed development supports this aim of CMATS in that the proposal involves additional landscaped pedestrian links that extend beyond the subject site to the Black Ash Park and Ride facility.

The CMATS Cycle Network builds on the strategy and framework previously identified in the Cork Metropolitan Cycle Network Plan (2017). As such, additional cycle links have been proposed in CMATS that align with the proposed public transport networks including BusConnects. These include new primary routes, one of which runs along the eastern boundary of the subject site at Kinsale Road.

Regarding primary cycle routes, CMATS states that:

Primary routes have been designated as such because they experience the highest level of demand. Primary routes are typically direct and provide medium-long radial connections to key destinations across the CMA

[Cork Metropolitan Area]. These routes are supplemented by secondary and feeder routes which may provide access to residential catchments.

The strategy identifies 10 specific key primary cycle routes to be improved within the Cork Metropolitan Area, of which Kinsale Road-Cork Airport is one.

CMATS also makes provision for a greenway following Tramore River to connect to Tramore Valley Park. This route could potentially be linked to the development site via proposed pedestrian and cycle lanes along Kinsale Road, which may ultimately connect to a bridge connection over the South Link Road, a separate project from the proposed development which is currently being explored by Cork City Council. Such a link would undoubtedly be of use and benefit to future residents.

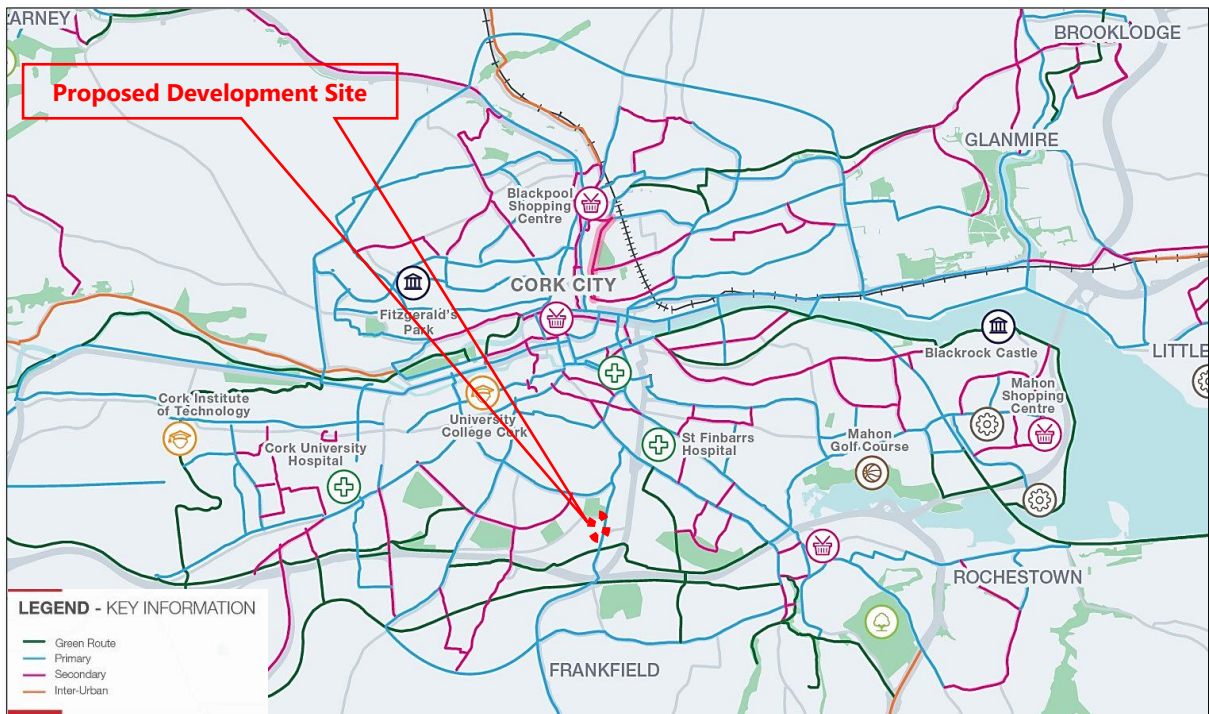


Figure 16. Detail from the CMATS Cycle Network Map showing a primary cycle route running along the eastern boundary of the subject site at Kinsale Road. Location of subject site generally indicated in red. (Source: CMATS, 2020; Annotated by Coakley O'Neill Town Planning, 2021).

6.7 Cork Cycle Network Plan (2017)

Cork City Council and Cork County Council commissioned the Cork Metropolitan Cycle Network Plan to increase cycling mode share in the Cork Metropolitan Area from its present low base and to provide a clear plan for the development of the cycling network to encourage greater levels of cycling trips to places of employment, education, recreation and leisure.

The cycling facility on Kinsale Road was identified in the plan as having the potential to be a high-quality facility in the Cork Metropolitan Area cycle network that requires some upgrade and maintenance work.

According to the plan, the key locations the Kinsale Road cycling route serves are Black Ash Industrial Estate, South Ring West Business Park and surrounding employers and residential areas. The Kinsale Road cycle route also joins with a main south-east arterial route on South Douglas Road.

The proposed development will contribute towards some of the upgrading and maintenance work required for the Kinsale Road cycle route as identified in the Cycle Network Plan.

In addition, the plan proposes an east-west Greenway route to run from Curraheen to Douglas via Tramore Valley Park. As noted above in the preceding section of this report, this greenway route will have linkages with the pedestrian and cycling infrastructure on Kinsale Road as the provision of an overbridge connection over the South Link Road is currently being explored by Cork City Council.

As has already been highlighted in this report regarding the delivery of the BusConnects service, the increase in population living along the Kinsale Road cycle route and in close proximity to the proposed east-west Greenway crossing of Kinsale Road may assist in expediting the delivery of this strategic metropolitan greenway infrastructure.

6.8 Climate Action Plan 2021

The Climate Action Plan 2021 sets out Government policies that will support the achieving of a 51% reduction in overall greenhouse gas emissions by 2030, enabling Ireland to reach net-zero emissions by 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

One of the targets of the Climate Action Plan aimed at meeting the required level of emissions reductions by 2030 is to fully implement the NPF.

Specifically, it is the NPF objectives and policies relating to compact growth and brownfield and infill development which the Climate Action Plan refers to as the means by which the spatial planning sector will contribute towards GHG emission reductions. These policies and objectives will ensure that more people will be living within the existing built-up footprint of cities and towns and making much more use of sustainable modes of transport.

Achieving the objectives of the Climate Action Plan will thus be supported through:

- *Reduced travel distances between home, work and services, which will enable a greater proportion of journeys by bicycle or on foot (zero emissions)*
- *Greater urban density will ensure more viable public transport leading to reduced transport emissions*
- *Higher density residential development, which tends to comprise smaller units and, therefore, require less energy to heat – NPF targets require the proportion of apartments to treble, from 13% in 2019, to 39% by 2030*
- *Closer proximity of multi-storey and terraced buildings, which will require less energy and make renewables-based systems of energy distribution, such as district heating, or area-wide technology upgrades, more feasible*

The proposed development is located in a sustainable inner suburb of Cork City, with existing and proposed transportation modes that supports walking, cycling and use of public transport, thus maximising the potential for sustainable transportation modal choice.

The proposed development is further responsive to climate change in that it contributes to a reduction in urban sprawl, regenerates brownfield land and incorporates SuDS which will improve the quality of surface water run-off, thereby safeguarding local biodiversity.

The Climate Action Plan envisages that, by 2030, up to 80% of electricity will be generated using renewable energy, with 1.5-2.5 GW from solar PV, and will develop a Small-scale Generation Scheme (>50 kW) to support the deployment of rooftop and ground-mounted solar PV.

The proposed development responds directly to this new paradigm in that solar PV panels will be installed on the roof of the majority of the residential buildings.

The proposed development is also focused on delivering a high-quality built form that will be focused on energy efficiency. As detailed in EDC's Energy Statement, which accompanies this application, Exhaust Air Heat Pumps will be used throughout the scheme to heat internal spaces as well as to heat domestic water. Best practice fabric U-values and air tightness standards will be implemented in order to minimise heat flow/loss through the building envelope. Passive solar principles have informed the design and external shading – in the form of window reveals and overhangs, and solar performance glazing – will be incorporated into the façade design to assist in the reduction of overheating. Meanwhile, passive solar heat gain will be harnessed by allowing sunlight to enter the buildings in areas with high thermal mass such as exposed concrete.

In addition, the proposed development will contribute towards the creation of a compact urban environment in the south inner suburb of Ballyphehane, with reduced car parking provision and enhanced cycle parking provision. The proposed development will have a positive impact on climate action by reason of being a high-density predominantly residential scheme that benefits from sustainable connectivity with the city centre and other hubs of employment, social, educational and recreational importance.

6.9 Urban Development and Building Height Guidelines (2018)

The Guidelines are premised on there being *"a presumption in favour of buildings of increased height in our town /city cores and in other urban locations with good public transport accessibility"* (para 3.1). They require Local Authorities in their plans to be *"more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, while also being mindful of the quality of development and balancing amenity and environmental considerations."*

Specifically, SPPR (Specific Planning Policy Requirement) 3A of the Guidelines state that where:

- *an applicant for planning permission sets out how a development proposal complies with a number of criteria [in relation to design, context, visual impact, wind assessment, daylight/sunlight/overshadowing, etc.], and*
- *the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines, then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.*

Therefore, proposals for tall buildings can no longer be ruled out in principle in the built-up footprint of Cork City.

The Guidelines set out three development management principles that planning authorities must follow when assessing planning applications, namely if the proposal positively assists:

in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres.

It has already been explained above in this report how the proposed development is consistent with NPF objectives regarding brownfield and infill urban development that supports modal shift, and especially with the National Strategic Outcome of delivering compact growth in urban centres.

In addition, the Guidelines list multiple development management criteria, regarding different scales of development, that applicants must satisfactorily demonstrate to the planning authority that their application follows. These criteria are as follows:

At the scale of the relevant city/town

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

In terms of radial and orbital connectivity, there are several bus stops located near the site which are within a 15-minute walking distance from the subject site and which are served by the following routes:

- Route 203 – Lehenaghmore – City Centre – Farranree
- Route 206 – Grange – South Mall
- Route 219 – Munster Technological University Cork (formerly CIT) – Mahon Point Road
- Route 213 – Black Ash – City Centre
- Route 226 – Cork Railway Station – Cork City Bus Station – Cork Airport – Kinsale
- Route 209A – St. Patrick Street – Ballyphehane

Of these routes, and as noted in the Bus Network Capacity Assessment Report which accompanies this application, Route No.213, the closest to the proposed development site has the most total peak hour capacity of 630 passengers during both the AM and PM peaks. It is important to note that walk-in pedestrians can use the bus services within the Park & Ride between the hours of 07:00 and 20:05, with the option to pay on the bus or use a leap card. The proposed development includes an upgrade to the Kinsale Road/Mick Barry Road junction to facilitate pedestrian connectivity between the proposed development site and the Black Ash Park and Ride.

There are also multiple proposed Bus Connects routes within the vicinity of the site. The routes include No. 5, 6, 7, 13, 14 and 42X. Routes No. 6 (Frankfield to Mercy Hospital) and 14 (CUH to Little Island) directly serves the proposed development site. Bus frequency in the vicinity of the proposed development will increase when Cork BusConnects is implemented.

Generally, the Bus Network Capacity Assessment Report has concluded that the percentage increase in bus passengers due to the proposed development is minor.

- Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.

The Architectural Design Report prepared by Reddy Architecture and Urbanism sets out how the proposed development has evolved during the design process. This included a critical assessment at an early stage to arrive at a scheme with buildings of a height and massing that are justified in their context, that will have a positive impact on the area, that do not interfere with any protected views, and to design a scheme that responds to the significant and unconstrained potential of a large brownfield site that is capable of generating its own character as a new high profile, high quality, predominantly residential neighbourhood hub at a key entrance to Cork City. The design of the proposed development has also taken into consideration advice from the local authority regarding the provision of a scheme with a range of heights and typologies, and thus includes 5no. 3-storey buildings of duplex and townhouse apartments as well as a 4-storey building with deck-access apartments along Kinsale Road at the south-eastern site corner. The proposed development will also improve the public realm in the vicinity of the site, especially with regard to walking and cycling infrastructure and improved pedestrian connectivity between the site and the Black Ash Park and Ride facility (currently and underutilised bus service with capacity to cater for additional passengers), as well as delivering new public open spaces, and services for the benefit of existing and future inner suburban residents, employees and visitors.

In addition to a single storey coffee kiosk in the town square, the proposed development includes 5no. buildings at 3 storeys high, 1no. building at 4 storeys high, 1no. building at 6 storeys high, 1no. building at 7 storeys high, 1no. building at part 6, part 8 storeys high, 1no. building at 9 storeys high, and 1no. building at part 6-8 storeys high with 1no. 15 storeys high tower. This is considered to be consistent with national and regional planning objectives to achieve compact urban growth through the densification of brownfield sites. The rationale for the height of the proposed development is also derived from the emerging pattern of permitted development in Cork's southern suburbs. In particular, the permitted SHD project at Jacob's Island involves 3no. buildings at 6 storeys high, 1no. building at 7 storeys high, 1no. building at 8 storeys high and 1no. building at 25 storeys high. The proposed development is markedly closer to Cork City centre than the Jacob's Island site, being located in an inner suburb as opposed to an outer one. As a result, a predominance of 6-9 storey buildings is considered appropriate at the location of the proposed development, especially when accompanied by 3 and 4 storey buildings.

Justification for the height of Building E in particular, which is proposed at 15 storeys, is considered on the following grounds:

- **The building's location at the north-eastern corner of the site – at the brow of a hill and at the junction between Tramore Road and Kinsale Road – serves as a landmark building and focal point for the scheme itself and for the wider inner suburb of Ballyphehane, as well as heralding the southern entrance into Cork City. Two other existing landmark buildings are visible from this part of the subject site – the Elysian and the Church of Christ the King, Turner's Cross – and Building E of the proposed development is designed to speak to, but not deter from, these landmark buildings. A protected view of Christ the King Church begins at this junction between Tramore Road and Kinsale Road and Building E therefore serves as an orientation point for emphasising the view of the Church from this traditional approach into the city, without impacting this protected view.**

- **Building E is also regarded as furthering the language of the evolving skyline of Cork City, which has seen the granting of permission for tall buildings in the city core at Custom House Quay, Albert Quay, Railway Gardens, the Prism, Horgan's Quay and Victoria Road, and in the southern city suburbs at Jacob's Island and the former Crow's Nest site.**
- **In addition to considering the height of Building E being justified in pragmatic terms regarding densification and in architectural and urban design terms regarding the importance of landmark buildings in urban environments and Cork's evolving skyline in this regard, the height of Building E can further be considered appropriate from a cultural and economic perspective in terms of the branding of Cork. As a landmark inner suburban residential building located at the southern entrance into Cork City – the entrance that is used on approach from Cork Airport – Building E of the proposed development will assist in communicating the fact that Cork City is a dynamic, modern city and an attractive living and working city.**

The proposed development will thus:

- Help deliver economic growth, intensification and regeneration of Cork City and the Metropolitan Area generally;
- Increase density in an area well-served by public transport, infrastructures and facilities;
- Sensitively respond to the existing townscape, landscape character and setting of the city;
- Effectively contribute to place-making, an enhanced city image and co-ordinated skyline;
- Enhance legibility and local distinctiveness;
- Protect and enhance the view of Christ the King Church;
- Provide a comprehensive development with quality architectural and urban design of the highest order;
- Minimise negative impacts on the immediate environment, its residents and neighbours; and
- Will deliver added regeneration and public benefits.

Therefore, it is our opinion that the height of the proposed development is entirely justified.

- Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

A detailed and extensive landscape and visual impact assessment has been carried out and is contained in Chapter 12 of the EIAR which accompanies this planning application. This landscape and visual impact assessment assessed 22 no. views.

Chapter 12 of the EIAR describes how, internally and externally, the proposed development will constitute a significant intervention in the local suburban landscape which will change the character of the site and influence the character of the locality. The proposed development site will be transformed from its redundant condition to a residential neighbourhood and town square.

The loss of existing boundary trees will be mitigated by a replacement planting programme for the site to include specimen trees, wildflower meadows and a range of pollinator-friendly shrubs and groundcover.

The landscape effect is considered to be significant, on the site and its immediate vicinity. The perception of the area as a car-dominated retail warehouse shopping environment will change. The proposed development will deliver a sense of neighbourhood comprised of a hierarchy of residential blocks and town houses with a series of interior recreational courtyard spaces to cater for the needs of the residents. The town square at the northern end of the subject site is a public space finished out with a range of high-quality hard and soft landscape treatments, street furniture, lighting, and a coffee kiosk. The square and adjoining services will be available to the local and wider communities of Ballyphehane, Togher and Turners Cross.

The tallest building of the development, located at the Kinsale Road/Tramore Road junction, will be a distinctive landmark in the local suburban setting. The overall quality effect on landscape will be beneficial reflecting the delivery of an attractive and vibrant neighbourhood.

Chapter 12 of the EIAR concludes that the large number of neutral effects recorded for the views assessed reflects the capacity of the site and locality to accommodate development of this scale without adversely affecting landscape or visual quality.

Beneficial outcomes associated with the development relate to the delivery distinctiveness, sense of place, quality of materials and finishes and green infrastructure in the form of specimen tree planting along adjoining roads.

There are no protected views or prospects affected by the proposed development and there are no overshadowing or overlooking issues arising in respect of residential properties in the vicinity of the site (the nearest residential property to the site is approx. 170m to the west along Tramore Road).

- On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The proposed development will make an overwhelmingly positive contribution to place-making by introducing a new neighbourhood hub with a new street as well as a series of landscaped, interconnected public open spaces. The proposed development is also linked with Black Ash Park and Ride and has the potential to link with Tramore Valley Park (which is being progressed as a separate project by Cork City Council and which will facilitate easy and safe pedestrian and cycling connectivity for the entire local population to these facilities and amenities). The variety in height provided throughout the scheme, the variety in materials used and the architectural design of the building facades, and the landscaped buffer zone between the buildings and Kinsale Road and Tramore Road will create an active street edge and visually interesting streetscape which will amount to a great improvement on what is currently the case.

At the scale of district/ neighbourhood/ street

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.

The proposed development delivers high quality, exemplar modern architectural form at an appropriate scale of development at an elevated, focal gateway location in Cork City, at the junction of Kinsale Road and Tramore Road and along the southern approach into the city. It is intended that the proposed development will set a quality

benchmark within Cork, which is experiencing significant development at the moment. With its 15-storey tower in the form of Building E, this building will be a beacon for a city rising in a highly sustainable location, acting as a catalyst for the further regeneration of Tramore Road and the Ballyphehane area.

The tallest element of the scheme – Building E – is situated on the brow of a hill on the prominent junction between Kinsale Road and Tramore Road and highlights this important entrance on the southern approach into Cork City as well as emphasising the view looking towards the city from Kinsale Road, especially the protected view of Christ the King Church at Turner's Cross. Building E itself is carefully designed and will provide an elegant and slender addition to the skyline in views from close-by as well as over the city. A tall building on this site with its raised elevation and location is justified and it will positively contribute to and complement the city's evolving skyline and the branding of Cork.

- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab buildings with materials / building fabric well considered.

The proposed development is of high architectural quality, presented as a coherent series of 12no. buildings ranging in height from 1-9 storeys and culminating in the landmark 15 storey element of Building E in the most appropriate location on the site. 'Step outs' in the façades of the buildings are provided in a number of apartment units which serve the dual purpose of ensuring the facades of the buildings are visually interesting as well as providing a dual aspect characteristic to most of the units. Brick has been chosen as the preferred, high-quality and low-maintenance façade material, with the majority of the scheme being faced in brick and, with the exception of the 6-storey section of Building E along Tramore Road, the entirety of all outward-facing elevations of the scheme constitutes brick façades.

- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

The proposed development will improve the public realm in the vicinity for the benefit of the City, with an appropriate setback on the northern elevation from Tramore Road as well as the landscaped buffer zone with incorporated, separate pedestrian and cycle paths, and will open up the site through the provision of new public and semi-public spaces internally. The urban design response is set out in detail in the accompanying Architectural Design Report prepared by Reddy Architecture and Urbanism.

There are no historic flood events recorded within the proposed development site according to FloodInfo.ie. Notwithstanding, a Flood Risk Assessment (FRA) has been prepared and is included as an appendix to Chapter 14 of the EIAR which accompanies this planning application. The FRA finds that the risk of fluvial flooding from the nearby Tramore River is considered to be low. The risk of pluvial flooding, tidal flooding and groundwater flooding are also considered to be low.

In the event of a very extreme high-intensity rainfall event, the capacity of the drainage system for the proposed development could be exceeded leading to surface water/ponding on the site. Surface water attenuation structures will be incorporated into the surface water drainage system to attenuate the excess runoff in line with Cork City Council requirements.

Floodplain storage and conveyance will not be impacted by the proposed development and there will be no increase of flood risk off site. The site is located in Flood Zone C and so a Justification Test for the development is not required and it is necessary only to identify mitigation measures for any residual flood risk which has been described in the FRA.

- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

The layout of the proposed development responds to the accessibility of the site and a high degree of permeability in all directions is incorporated into the urban design of the scheme. The town plaza, garden court, and meadow parks with connecting pathways all facilitate easy access within and into the scheme. The massing of the scheme along Kinsale Road is broken up and has visual clues as to the character areas within, with 5 no. clearly defined access points from Kinsale Road and Tramore Road.

The proposed development includes children's play areas, a town square plaza, a creche, gym, café, retail unit and coffee kiosk and thus offers facilities for a wide range of different ages. In addition, the landscaped, residential street edge of the proposed development along Kinsale Road will be a pleasant space for passers-by to pass through, while the tree planting and wide paving along Tramore Road which lead into the town square plaza will be inviting to passers-by.

- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

The mix of uses, especially the children's play areas, retail, café, creche, coffee kiosk and gym uses, the town square plaza and linkages to Black Ash Park and Ride and, potentially, to Tramore Valley Park (subject to a separate project on the part of Cork City Council), ensure the proposed development integrates physically and socially into the wider suburb of Ballyphehane, and the mix of uses will complement the prevailing commercial uses in the immediate vicinity of the site. As the planning history shows, the immediate surrounding area, while zoned for "Light Industry and Related Uses", "Retail Warehousing" and "Sports Grounds", is, in reality, a mixed-use context. This was key to the decision of Cork City Council to progress Variation No. 6 of the current Cork City Development Plan 2015 to rezone the proposed development site from Light Industry and Related Uses to Residential, Local Services and Institutional Uses, which was adopted by Members on 11th November, 2019. Accordingly, the proposed development that is mixed use but primarily residential is entirely appropriate and sympathetic to its siting.

The various neighbouring uses of a sports ground, fast food restaurant, newsagents at the filling station north-east of the subject site, convenience retail store south of the subject site, and café to the north-east are all highly compatible with the primarily residential use of the proposed development.

In addition, the neighbouring dwelling choices are primarily traditional three-bedroom semi-detached houses to the north-east, north, north-west and west. The proposed development comprises 31% one-bedroom units and 55% two-bedroom units in a range of apartment and townhouse types. This greatly adds to the choice of dwelling size and type available in the area.

At the scale of the site/building

- The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The proposed development has been designed with floor to ceiling glazing, with adequate ventilation, for all apartments, therefore maximising views and access to natural daylight as far as possible. 68% of dwellings benefit from having a dual aspect. The design approach has also ensured that there will be minimal overshadowing.

- Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

A Daylight and Sunlight Analysis has been completed by Arup in full compliance with the relevant BRE Guidance. Copies of the Daylight and Sunlight Analysis accompany the planning application. The Analysis makes the following observations:

- The proposed development will have a negligible impact on the existing surrounding properties.
- All proposed amenity spaces will be greater than the BR 209 target for direct sunlight (SHOG).
- 75% of the south facing windows tested meet or exceed the BR 209 recommended target of 25% for annual sunlight (PASH).
- 87% of the south facing windows tested meet or exceed the BR 209 recommended target of 5% for winter sunlight (PWSH).
- When combined kitchen and living rooms are benchmarked against 1.5% ADF, 87% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.
- When combined kitchen and living rooms are benchmarked against 2.0% ADF, 85% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.
- 87% of the rooms tested meet the Room Limiting Depth (RLD) requirement.

In summary, the proposed development can be said to:

- Have an overall negligible impact on the levels of daylight and sunlight availability in the surrounding existing properties and amenity spaces.
- Produce an environment that allows for plentiful sunlight penetration into all created amenity spaces and the majority of south facing apartment windows, in addition to producing appropriate levels of ADF within the apartments themselves.

Specific Assessments

The Guidelines indicate that in order to support proposals at some or all of these scales, specific assessments may be required and these may include:

- Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

The proposed development has been subject to a Wind Microclimate Study prepared by B-Fluid (Buildings Fluid Dynamic) Consultants, copies of which accompany this planning application. The study shows that the development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian), and, from a qualitative point of view, it is not expected to introduce any critical impact on the surrounding areas or on the existing buildings.

The following is a summary of the wind microclimate study:

- The wind profile around the existing development environment was built using the annual average meteorology data collected at Cork Airport Weather Station. In particular, the local wind climate was determined from historical meteorological data recorded 10 m above ground level at Cork Airport.
- The prevailing wind directions for the site are identified as South-South-West, South-West and West, with magnitude of approximately 6m/s.
- The proposed Creamfields Development, Kinsale Road, Cork 's Project has been designed in order to produce a high-quality environment that is attractive and comfortable for pedestrians of all categories. To achieve this objective, throughout the design process, the impact of wind has been considered and analysed, in the areas where critical patterns were found, the appropriate mitigation measures were introduced.
- As a result of the final proposed and mitigated design, wind flow speeds at ground floor are shown to be within tenable conditions. Some higher velocity indicating minor funnelling effects are found near the South side of the development and areas between the blocks. However, as it was shown in the Lawson map, the areas can be utilised for the intended use such as short-term sitting, walking and strolling.
- Given the position of the development, major issues of high flow speeds are not expected on footpaths.
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for "Frail persons or cyclists" and for members of the "General Public" in the surrounding of the development.
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.

- In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

The proposed development site has been assessed for the presence of bats. Although some of the trees on site such as Hawthorn and Willow are mature, there are no large mature or overmature trees with the potential to be of value for roosting bats. The habitats which dominate the proposed development site, i.e., recolonising bare ground and artificial surfaces, are of low value for foraging bats. A bat survey carried out by DixonBrosnan in September 2021 focused on habitats within the proposed development site as well as on external boundaries. Bat activity levels were low to moderate, with foraging recorded by two species i.e., Common Pipistrelle and Leisler's Bat. Activity was concentrated in the southeast corner of the proposed development site, where vegetation is denser and provides better foraging habitat. Bat surveys indicate that bat activity within the site is sporadic, however, there

will be a net loss of foraging habitat for bats within the proposed development site. No roosts will be affected. Overall, there will be a net loss of small areas of foraging habitat, but some long-term potential foraging habitat will be provided by landscape planting. Overall, the impact will be negative, slight and long-term. Please refer to Chapter 10 of the accompanying EIAR for further details.

- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*

The proposed development will not impact telecommunication channels.

- *An assessment that the proposal maintains safe air navigation.*

Having regard to Figure 3.7 of the *Ballincollig Carrigaline Municipal District Local Area Plan 2017* and Figure 10.32 of the *Draft Cork City Development Plan 2022-2028*, the proposed development site is located outside the Public Safety Zones relating to Cork Airport. In relation to Obstacle Limitation Surfaces (OLS), which control the erection of obstacles to aviation that might endanger aircraft in flight, the proposed development, at its maximum height (Block E at 49.7m (+67.1m OD)), is lower than the maximum allowable height of obstacles (>90m), as per Table 3.10 and Figure 3.8 of the *Ballincollig Carrigaline Municipal District Local Area Plan 2017*.

6.10 Housing For All (2021)

On 2nd September 2021 the Government launched the latest national housing policy document in the form of “Housing for All – A new Housing Plan for Ireland” (HFA). This is the Government’s revised policy and investment plan (replacing the 2016 “Rebuilding Ireland: Action Plan for Housing and Homelessness”) to address the housing crisis which has affected the country since 2014.

With regard to new housing supply, section 3 of the HFA states that over 300,000 new homes are needed by 2030 to address pressure on the housing market. This means 33,000 new homes per annum on average to 2030.

Section 5.6 of the plan emphasises that transport infrastructure and access to public transport are critical enablers of new housing supply, and that if the long-term trend of growth in demand for housing and transport is to be met, we must improve land-use and transport planning to meet the NPF strategic objective of achieving compact growth.

The proposed development, in delivering an additional 609 no. residential units, including 122 no. social housing units, will contribute towards achieving the housing target of the HFA.

6.11 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

Having regard to these Guidelines, the proposed development is focused on:

- Prioritising walking, cycling and public transport, and minimising car usage;
- Providing easy access for all users and ease of finding one’s way around;
- Promoting the efficient use of land and of energy, and minimising GHG emissions;
- Providing a mix of land uses to minimise transport demand; and

- Reducing traffic speeds in housing developments.

The proposed development is plan-led in that it will deliver an efficient use of appropriately zoned land and an increased residential population of a minimum of 1,145 persons² in a new high-density, high-quality, distinctive primarily residential development in Cork City, which is fully supported by national, regional and local planning policy.

In accordance with Chapter 4 of the Guidelines, the proposed development will:

- Prioritise public transport, cycling and walking, with a significantly reduced quantum of car parking (this is outlined in the Traffic and Transportation Assessment and Mobility Management Plan Statement, prepared by Arup, and which accompanies this planning application);
- Ensure access for everyone, including people with disabilities (see the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism);
- Encourage more efficient use of energy and a reduction in GHG emissions (see the accompanying SHD Energy Statement prepared by EDC);
- Include the correct quality and quantity of public open space (see the accompanying Architectural Design Statement);
- Include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood – the predominance of residential ground floor use means a high degree of passive surveillance throughout the proposed development, both in terms of the meadow parks and courtyard and the street edge along Kinsale Road. The ground floor retail, gym and café uses in Building E will also provide passive surveillance along Kinsale Road and Tramore Road, as well as internally in the scheme regarding the town square plaza in combination with the coffee kiosk. In addition, there are only two vehicular entrances proposed to this 3.39ha site, with the emphasis throughout the scheme on pedestrian permeability and safety by means of shared surfaces throughout the development;
- Present an attractive and well-maintained appearance with high quality material finishes on the facades of the buildings as well as the hard and soft landscaping of the open spaces;
- Promote social integration and provide for a range of household types for different age groups, including 9no. 1-bed, wide deck-access apartments specifically designed for elderly residents. The predominant focus is on open tenure and the Build-To-Rent units are focused on the rental sector;
- Protect, and where possible, enhance the built environment; and
- Provide for appropriate drainage systems.

The proposed development site falls within the following criteria, which are locations that are appropriate for increased densities: (b) Brownfield sites in combination with (c) Public transport corridor.

² If each bedroom is occupied by 1 person. The maximum bed space capacity would cater for 2,147 people.

Although the Guidelines caveat the criteria of (b) Brownfield sites as being located within city or town centres, the definition the guidelines then offer is “any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces” and offers redundant industrial lands as one of the primary examples of what constitutes brownfield land. Therefore, notwithstanding that the subject site is not located in the city centre, it is appropriate to consider the site as a brownfield site for the purposes of assessing the site against the criteria of the Guidelines.

Paragraph 5.7 of the Guidelines states that in the case of brownfield sites, and particularly those located close to existing or future public transport corridors, the opportunity for their re-development to higher densities is subject to the following safeguards:

- *Compliance with public and private open space standards:* the proposed development provides 0.7865ha (23%) of public space at ground level, including landscaped, interconnected semi-public open spaces in the form of the meadow parks and garden court, as well as 2 no. rooftop gardens, a public town square plaza and upgraded public realm along Kinsale Road and Tramore Road and at the junction between Kinsale Road and Mick Barry Road. In addition, the proposed development meets all the necessary minimum standards regarding private open space provision.
- *Avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours:* the accompanying reports of Arup (daylight, sunlight and overshadowing) and B-Fluid (wind modelling), clearly indicate that the proposed development will not have an adverse impact on the amenities of existing or future adjoining neighbours.
- *Good internal space standards of development:* as set out in the Reddy Architecture and Urbanism Housing Quality Assessment which accompanies the planning application, the proposed development provides internal spaces that meet or exceed the requirements of the Guidelines.
- *Conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing:* the proposed development is located in the Ballyphehane inner suburb of Cork City which has been identified as being a disadvantaged area in need of regeneration and urban renewal. In addition, the site was the subject of the rezoning that constituted Variation No. 6 of the *Cork City Development Plan 2015-2021*, where the zoning of the subject site itself was changed from “Light Industry and Related Uses” to “Residential, Local Services, and Institutional Uses”. This variation of the Plan has established that a mixed use, primarily residential development is permissible in principle on this site. Under the *Urban Development and Building Heights Guidelines for Planning Authorities, 2018* proposals for tall buildings cannot be ruled out in principle and must be assessed under the principles set out in those Guidelines. Section 6.9 above sets out how the proposed development is consistent with the provisions of those Guidelines.
- *Recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character of an Architectural Conservation Area:* there are no protected structures on or within close proximity to the subject site and the site is not located in or near an Architectural Conservation Area. As has already been discussed in Section 6.9 of this report, a protected view of Christ the King Church, Turner’s Cross begins at the north-eastern corner of the site at the junction between Tramore Road and

Kinsale Road. The proposed development does not interfere with this protected view in any way – on the contrary, the tall building that is proposed – Building E – will serve to emphasise it.

- *Compliance with plot ratio and site coverage standards adopted in development plans:* The proposed development equates to a plot ratio of 1:1.8, site coverage of 26%, and a residential density of 180 units/ha. An indicative plot ratio of 1.0-1.75 is set out in the Development Plan. The plot ratio of the proposed development is generally consistent with this indicative measure. Densities in suburban areas will normally be a minimum of 75 units/ha along bus routes with higher densities appropriate on larger development sites (>0.5 hectares in size) capable of generating and accommodating their own character. There are no standards regarding site coverage. Owing to the size, character and context of the subject site, the nature and scale of the development, and the urgent national policy agenda to densify our urban settlements and counterbalance the disproportionate growth of the Greater Dublin Area, proposing a plot ratio that is marginally higher than the indicative one contained in the Development Plan is considered appropriate.

In relation to (b) and (c), the proposed development site is brownfield, is located along an existing and a planned public bus route and is within 15 minutes' walk of five other bus routes. The Guidelines state that the opportunity for the redevelopment of such sites to higher densities, subject to the above safeguards, should be promoted.

6.12 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)

Section 1.21 of the Guidelines states that Specific Planning Policy Requirements (SPPRs) contained in the Guidelines take precedence over any conflicting policies and objectives of development plans.

Section 2.4 of the Guidelines identifies central and/or accessible urban locations as being generally suitable for small-to-large scale and higher density development. The proposed development site, which is located along an existing public bus route which operates at a high frequency during peak times (i.e. every 10 minutes) and on a proposed public bus route that will operate at a minimum frequency of every 15 minutes, and is within 15 minutes-walk from 3 other public bus routes, can be classified as an accessible urban area.

The proposed development includes 48 no. townhouses, 304 no. standard apartments, and 257 no. Build-To-Rent apartments. Having regard to the Guidelines, the proposed development complies with the following SPPRs (as detailed in the Housing Quality Assessment prepared by Reddy Architecture and Urbanism):

SPPR 1

- 31% of the apartments are one-bedroom units. This is under the maximum upper limit of 50%.

SPPR 3

- All 1-bedroom apartments meet the minimum required floor area of 45m²
- All 2-bedroom apartments meet the minimum required floor area of 73m²
- All 3-bedroom apartments meet the minimum required floor area of 90m²

As the accompanying Housing Quality Assessment (prepared by Reddy Architecture and Urbanism) details, almost 72% of the proposed units (excluding those in Buildings E and F) exceed the minimum internal floor area standards

by 10% and all of the minimum floor areas for private amenity space for the various types of dwellings are met or exceeded. In addition, 19% of the Build-To-Rent apartments in Buildings E and F exceed the minimum internal floor area standards by 10%.

SPPR 4

- 68% of the proposed dwellings are dual aspect. This exceeds the minimum requirement of 50% in suburban locations.

The elevation drawings detail the proposed development's compliance with the following SPPR:

SPPR 5

- All ground level apartment floor to ceiling heights are a minimum of 2.7m.

The plan drawings detail the proposed development's compliance with the following SPPR:

SPPR 6

- All buildings comply with the maximum limit of 12 apartments per floor per lift/stair core.

In addition, the 257 no. Build-To-Rent apartments in Buildings E and F comply with the following SPPRs specific to Build-To-Rent developments:

SPPR 7

- Resident support facilities will be provided (concierge and management; parcel/post area; waste management).
- Resident services and amenities will be provided (community lounge/town hall events space, co-working lounge/business centre, cinema/media presentation room at ground level), and rooftop terraces on Levels 7 of both Building E and Building F.

SPPR 8

- Unit floor areas accord with the Guidelines per each unit type.
- Noting there are no restrictions on dwelling mix or no. of units per core, 78no. 1 bed units; 142no. 2 bed units and 37no. 3 bed units are proposed in Buildings E and F, of which 82% are dual aspect in Building E and 52% are dual aspect in Building F. No studios are proposed.
- The proposed development will ensure overall quality, with a good provision of storage and private amenity space per apartment as well as communal amenity space, balanced with the provision of compensatory communal support facilities.
- Floor to ceiling heights are proposed at 2.7m, and there are no more than 6 units per core in Building E and no more than 9.5 units per core in Building F.

In addition to all of the above, minimal car parking is provided for the entire scheme (209no. shared spaces plus 98no. reserved spaces for the Primary Care Centre (which is the subject of a separate application), whereas 1,145no. cycle spaces are proposed. 122no. units are proposed to be leased for Part V purposes. 3no. children's equipped neighbourhood play areas are also proposed in the garden court and in the meadow parks.

In addition to the above, section 2.6 of the Apartment Guidelines highlight that:

Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes.

In the context of Cork, apartments represent 19.3% of all household types in Cork City. However, according to Census 2016 data, 97% of all apartments built in Cork City were built before 2010, excluding premises for which the period built was not declared.

Over the last three years (mid-2018-present)³, 11,716 apartments were built in Ireland but just 360 of them were built in Cork City i.e. just over 3% of the total number of apartments built nationally. Over the same period, 65,230 dwellings were built in Ireland but just 2,362 of them were built in Cork City i.e. 3.6% of the total number of dwellings built nationally. In 2022, with an estimated population of at least 5million nationally and 235,643 in Cork City⁴, Cork City will be home to at least 4.7% of the national population.

It is clear from the above figures that Cork, Ireland’s second city, is seriously underperforming in respect of the delivery of new housing, and specifically apartments, to serve both its existing population and its projected population growth as envisaged under the NPF. The proposed development is a direct and conscious response to this situation.

6.13 Urban Design Manual – A Best Practice Guide

The Architectural Design Report prepared by Reddy Architecture and Urbanism sets out the urban design rationale for the proposed development in detail. In relation to the 12 criteria of the Urban Design Manual, it can be stated as follows:

Criterion	Commentary
01. Context: How does the development respond to its surroundings?	<p>The proposed development positively responds to the opportunity to mark this important gateway location at the southern approach into Cork City by a significant, primarily residential scheme on a large 3.39ha site, with the inclusion of a tall building. This latter element of the scheme is in accordance with ancient and contemporary architectural and urban design principles. In addition, the Ballyphehane residential suburb has been identified as a disadvantaged area in need of regeneration, where a succession of local authority-built housing estates and architecturally utilitarian commercial and industrial buildings currently characterise the surrounding urban form.</p> <p>The proposed development creates a southern focal point for Ballyphehane and is distinctive and of a scale and height that is appropriate to its large site context, surrounding site context and its key location on the southern approach into Cork City. As a landmark the development is perceived as a positive addition to Ballyphehane and the city and delivers an architecturally exemplar building that sets a quality benchmark within Cork. Along the eastern boundary, the proposed development</p>

³ In 2018, the Central Statistics Office began publishing reports on New Dwelling Completions in Ireland. Detailed breakdowns of dwelling types completed in the jurisdictions of the thirty-one local authorities are available for Quarter 3 2018 – present (Quarter 3 2021) at: <https://www.cso.ie/en/statistics/construction/archive/> [accessed 3rd December 2021].

⁴ Source: *Cork City Draft Development Plan 2022-2028*, page 32.

	<p>includes a landscaped buffer zone for pedestrians and cyclists along the Kinsale Road between the ground floor residences of the scheme and Kinsale Road itself. The western and southern site boundaries will comprise a mixture of tree planting, while the northern boundary with Tramore Road will involve paving and street trees. These measures are considered wholly appropriate responses in terms of boundary conditions on the site.</p> <p>The tallest element of the scheme is situated on the brow of a hill on the prominent junction between Kinsale Road and Tramore Road to highlight this important entrance on the southern approach into Cork City and to emphasise the view looking towards the city from Kinsale Road, especially the protected view of Christ the King Church at Turner’s Cross. Building E itself is carefully designed and will provide an elegant and slender addition to the skyline in views from close-by as well as over the city. A tall building on this site with its raised elevation and location is justified and it will positively contribute to and complement the city’s evolving skyline and the branding of Cork.</p> <p>The proposed development includes duplex buildings of apartments and townhouse apartments that are 3 and 4 storeys high, which coherently knits the proposed development together with nearby suburban residential patterns of development and thus provides a transitional reference point between nearby residential development and the taller aspects of the scheme.</p>
<p><i>02. Connections: How well connected is the new neighbourhood?</i></p>	<p>The layout of the proposed development responds to the accessibility of the site. The mix of uses (especially the creche, retail, café, coffee kiosk and gym uses), the landscaped semi-public meadow parks and garden court, public town square plaza and improved linkages to the currently underutilised Black Ash Park and Ride ensure the proposed development integrates physically and socially into the wider suburb of Ballyphehane, with a high degree of permeability in all directions incorporated into the urban design of the scheme.</p> <p>As the planning history shows, the immediate surrounding area, while zoned for “Light Industry and Related Uses”, “Retail Warehousing” and “Sports Grounds”, is, in reality, a mixed-use context. Accordingly, the proposed development that is mixed use but primarily residential is entirely appropriate and sympathetic to its siting.</p> <p>In addition, as the Black Ash Park and Ride bus terminus is less than 5 minutes’ walk from the subject site and as a future priority BusConnects route will run along the eastern site boundary with Kinsale Road, the proposed development facilitates excellent connectivity to and from the City Centre by public transport. The site being within a 15-minute walk of five other bus routes, that currently have capacity, also ensures easy east-west access across the southern suburbs of the city.</p>
<p><i>03. Inclusivity: How easily can people use and access the development?</i></p>	<p>With its mix of one-bedroom (31%), two-bedroom (55%) and three-bedroom (8%), and (6%) four-bedroom units, mix of unit typology in the form of regular apartments and townhouse apartments which have own-door access, with accessible lifts in Building B, C, E, F, and J, and with the 9no. deck-access apartments in Building N, the proposed development caters for the aspirations of a range of people and households.</p> <p>The landscaped meadow parks and garden court with connecting pathways both facilitate easy access within and into the scheme, for the future residents as well as the wider community of Ballyphehane and other visitors. The massing of the scheme along Kinsale Road is broken up and has visual clues as to the character areas within with 5no. clearly defined access points from Kinsale Road and Tramore Road.</p>

	<p>The proposed development includes lower and upper landscaped meadow parks, a landscaped garden court, 3 no. children’s outdoor play areas, a town square plaza, a creche, gym, café, retail unit, coffee kiosk and thus offers facilities for a wide range of different ages. In addition, provision of private amenity space for each dwelling unit either meets or exceeds the standards. Building F also includes communal spaces in the form of a community lounge/town hall events space, co-working lounge and cinema/media presentation room. These facilities will be for use by all residents of the scheme as well as the wider community, which will further serve to integrate the proposed primarily residential development with the surrounding established community.</p> <p>In addition, the landscaped, residential street edge of the proposed development along Kinsale Road will be a pleasant space for passers-by to pass through, while the tree planting and wide paving along Tramore Road, which lead into the town square plaza, will be inviting to passers-by.</p>
<p><i>04. Variety: How does the development promote a good mix of activities?</i></p>	<p>The proposed development will add to the mix of the surrounding neighbourhood and complement the prevailing commercial uses in the immediate vicinity of the site. Residents will animate the area outside of office and retail hours, and bring life to the streets, especially in the evenings and weekends. The proposed development provides for active ground floor uses (gym, café, coffee kiosk, creche and retail) in the northern section of the site which will animate the street and the town square. These uses are all located on the northern section of the site along the boundary with Tramore Road and at the junction of that road with Kinsale Road. This is the most prominent and accessible part of the site and the locating of these uses and the town square plaza here is a conscious urban design strategy. These facilities and services complement the established offering of facilities in the area.</p> <p>The various neighbouring uses of a sports ground, fast food restaurant, newsagents at the filling station north-east of the subject site, convenience retail store south of the subject site, and café to the north-east are all highly compatible with the primarily residential use of the proposed development. In addition to all of the neighbouring uses previously mentioned, there is also an ALDI supermarket approximately 415m north of the subject site.</p> <p>In addition, the neighbouring dwelling choices are primarily traditional three-bedroom semi-detached houses to the north-east, north, north-west and west. The proposed development comprises 31% one-bedroom dwellings and 55% two-bedroom dwellings. This greatly adds to the choice of dwelling size and type available in the area.</p>
<p><i>05. Efficiency: How does the development make appropriate use of resources, including land?</i></p>	<p>The proposed development maximises the development potential of this large, currently vacant, strategic brownfield 3.39ha site located on a public transport corridor by providing 609no. apartments (304no. standard apartments, 48no. townhouses and 257no. Built-To-Rent apartments) in a series of in a series of 11no. residential buildings that range in height from 3 and 4 to 6, 7, 8, 9 and 15 storeys, as well as a single storey coffee kiosk. The total gross floor area of the development proposed is 60,833.7m².</p> <p>The proposed development will improve the public realm in the vicinity of the site and will connect to existing public services. The landscaped meadow parks, garden courtyard, rooftop gardens and town square plaza are all south-facing, exploiting the best solar orientation for these public open spaces.</p> <p>There are currently 148 no. trees on site. 120 no. of these trees are categorised as being of low quality, or in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years, or are young trees (for more detail, please refer to</p>

	<p>the Landscape Design Rationale statement prepared by CSR, copies of which accompany this planning application). In order to deliver an interactive and permeable urban edge to the street along the eastern, northern and southern boundaries and to accommodate the development footprint generally, all existing trees are proposed to be removed. To mitigate the loss of existing site vegetation, the proposed development includes a comprehensive tree and shrub planting strategy aimed at greening the site to enhance the biodiversity potential of the site in line with the All-Ireland Pollinator Plan, using a range native and high value non-native species throughout the development. A total of 505 no. trees are proposed to be planted. Native woodland trees comprise some of the proposed planting. In addition, SUDS such as permeable paving, rain gardens, and the rooftop gardens on Buildings E and F have also been incorporated into the landscaping of the proposal. All of these measures will support biodiversity on site while providing amenity for residents and visitors to the site.</p> <p>Dedicated waste storage facilities are provided via 6no. large, ventilated storage rooms in buildings B, C, E, and F and adjacent to Building L. The approach taken in the design has been to reduce bin quantities and increase number of collections with increased recycling facilities provided. Waste streams expected include mixed municipal waste, dry mixed recyclables and glass. Space is also provided for future compost bins.</p> <p>The proposed development equates to a plot ratio of 1:1.8, site coverage of 26%, and a residential density of 180 units/ha.</p>
<p>06. <i>Distinctiveness:</i> <i>How does the proposal create a sense of place?</i></p>	<p>The proposed development site is located on an elevated, prominent site with the northern section of the site being at the brow of a hill and beside a significant junction between two important roads. The architectural design of the 12no. buildings is coherent in its form, layout and façade treatment. In addition, the large size of the site means that the proposed development functions as a distinct neighbourhood hub with its own character in southern Ballypheane. The buildings follow the north-south orientation of the site and are stepped in height and varied in profile along Kinsale Road so that the elevations rise from 4 storeys to a 15-storey landmark building in a sequential and legible manner.</p> <p>At 15 storeys, Building E will serve the function of a distinctive and attractive landmark brick building on site itself as well as for the surrounding area and will highlight the proposed development as one of the key landmarks in the city.</p> <p>The proposed development breaks down the development into a series of buildings that are separated by generous, internal landscaped public and semi-public open spaces which correspond with 4 “character areas” in the development – Town Square, Garden Court, and two Meadow Parks. The meadow parks and courtyard are focal points for the surrounding buildings with the town square plaza being the overall focal point for the scheme. In addition, the inclusion of 5no. 3-storey duplex buildings and 1no. 4-storey duplex and apartment building coherently knit the proposed development together with nearby suburban residential patterns of development and provide a transition reference point for the taller aspects of the scheme.</p> <p>The proposed development establishes a strong urban edge and well-defined street space along Kinsale Road and Tramore Road, with strong visual clues and clearly defined entrances to the character areas within the scheme. The proposed design respects the human scale at street level – there are residential apartments at ground floor level with floor to ceiling windows along Kinsale Road as well as a landscaped buffer zone with footpaths and cycle paths that serves as a transition zone between the built form of the development and Kinsale Road. In addition, the gym, café and</p>

	<p>retail units on the ground floor level of Building E are extensively glazed and front onto generously wide paving along Tramore Road.</p>
<p><i>07. Layout: How does the proposal create people friendly streets and spaces?</i></p>	<p>The layout of the proposed development is pedestrian focused and offers an attractive pedestrian route through the centre of the scheme with a meandering pathway through a series of character areas that move from a public town square environment to semi-public residential outdoor spaces, which are all south-facing and landscaped. These routes offer potential for pedestrian connectivity to adjoining sites to the west regarding any potential future development there.</p> <p>Primary vehicular access for the proposed development is centrally provided at the junction of Kinsale Road and Mick Barry Road. This access creates a central street that enables connectivity for future development to the west. All streets have a shared surface to support pedestrian movement through the scheme. The central street is fronted by 2no. 3-storey duplex buildings to north and south, thus providing a more suburban sense of scale along this street. In addition, the 48no. townhouse apartments throughout the rest of the scheme all have ground level own door access, which will generate a high degree of domestic activity at ground level in the proposed development.</p> <p>The street between Buildings I, L and N to the south and Buildings B and J to the north will provide access for essential services and there is no car parking provision along this street.</p> <p>The vehicular entrance to the car park under the podium in the northern section of the site is from Tramore Road, at the location of the current site entrance. This under croft carpark not only serves the residents but will also serve the anticipated Primary Care Centre (subject to a separate application). Locating the car park below ground level and having a minimal distance on site for traffic to travel to enter/exit the car park ensures a safer scheme for more vulnerable road users.</p> <p>There is some on grade parking on the street network of the scheme for residents and also visitors and/or drop off for the creche. This on grade parking is located along the central street and on the street to the west of Buildings B, C and the building which is anticipated to house a Primary Care Centre, subject to a separate application.</p>
<p><i>08. Public Realm: How safe, secure and enjoyable are the public areas?</i></p>	<p>The public realm areas are almost entirely internal to the scheme and overlooked by the residential and ground floor commercial and community uses. The wide, paved public area along Tramore Road invites passers-by, visitors and residents into the scheme and benefits from passive surveillance from the commercial ground floor uses in Building E. The public realm areas will be attractive and inviting spaces to be enjoyed by all, where ample open space has been created to ensure people can practice physical distancing.</p> <p>Vehicular movements on the internal street network are tempered by the fact that all streets have a shared surface.</p> <p>The orientation of the buildings around the internal open spaces will create a sense of enclosure whilst the fact that they are south-facing means they will receive direct sunlight throughout the day. In addition, all of the dwellings in the 5no. 3-storey duplex buildings have own door access. This, in conjunction with the fact that the remaining 48no. townhouse apartments in other buildings throughout the scheme also have own door access from street level, means that there will be a very high degree of passive surveillance in the proposed development – arguably much more than if the buildings were conventional apartment buildings.</p>

	<p>The external public realm area along Kinsale Road is well defined and landscaped which provides a pleasant and comfortable environment for pedestrians and cyclists, where physical distancing is easy to practice.</p>
<p><i>09. Adaptability: How will the buildings cope with change?</i></p>	<p>The proposed development has the potential to provide for a conversion of the ground floor commercial spaces to alternative uses.</p>
<p><i>10. Privacy and Amenity: How does the scheme provide a decent standard of amenity?</i></p>	<p>The proposed development provides for communal amenities on level 0 of Building F (reception, community space/town hall events space, cinema/media presentation room, and co-working etc.) to a total of 547.5m². The proposed development also provides for communal roof terraces on Levels 7 of both Building E and Building F. In addition, there are the landscaped meadow parks, a garden court, and town square plaza.</p> <p>There is also a café use on the ground floor of Building E (272m²), a gym use on the ground floor of Building E (550m²), and a coffee kiosk (100m²) in the south-western corner of the Town Square, all of which are available for the use of residents of the proposed development and are also open to the public.</p> <p>All apartments meet the requirements of the Apartment Guidelines, specifically: unit areas; bedroom areas; bedroom aggregate areas; and living/dining/kitchen areas. 68% of dwellings benefit from dual aspect, and there is a maximum of 9.5 units per core. All dwellings have a 2.7m floor to ceiling height.</p>
<p><i>11. Parking: How will the parking be secure and attractive</i></p>	<p>Minimal car parking is provided for the entire scheme (209no. spaces plus 98no. spaces for the anticipated Primary Care Centre, which is subject to a separate application), whereas 1,145no. cycle spaces are proposed. Of the 209no. car parking spaces, 62no. are surface level parking spaces with the remaining 147no. being provided in the undercroft car park. The 62no. on grade car parking spaces will benefit from passive surveillance, while the undercroft car park is secure by means of the fact that it has one entrance/exit and is sheltered from inclement weather.</p> <p>1,145no. bedrooms are provided in the scheme and 1,145no. bicycle parking/storage spaces have been provided within 7no. dedicated internal and external secure cycle stores (including 2no. internal bicycle store rooms totalling 168m² on level 0 of Building F, one being accessed from the underpodium car park, the other accessed by an external door on level 0 of Building F., and external covered bicycle shelter to the west and south of Buildings L). A large central bicycle stacking facility is provided on level 0 of Building E which merges with the undercroft car park using two-tier stack bike racks, with direct access to Kinsale Road via an external door on level 0 of Building F, as well direct access internally to all other buildings in the scheme. All of the bicycle parking is thus secure by way of being internally located under cover in the buildings/car park or benefitting from passive surveillance outdoors.</p>
<p><i>12. Detailed Design: How well thought through is the building and landscape design?</i></p>	<p>As is detailed in the accompanying Architectural Design Statement, the vision guiding the design of the proposed development is to consciously respond to the site and its context to deliver a “best-in-class” residential apartment scheme that provides attractive, modern, sustainable living accommodation finished to a very high standard, both internally and externally. The proposed development has also been designed as an appropriately scaled urban development to act as the basis for a new architectural idiom for the urban regeneration of the Kinsale & Tramore Road areas.</p>

	<p>The ratio of brick to render façade is 7:3. This ensures that a high-quality, low-maintenance finish predominates throughout the scheme and especially along the outward facing elevations along Tramore Road, Kinsale Road and along the south and west of the site.</p> <p>Shared surfaces across the entire internal street network ensure that the most comfortable and safe environment is facilitated for users of the scheme. In addition, the 3-storey buildings G and H along the central street and Buildings I, L, M and N that define the lower meadow park ensure that the central axis of the scheme is characterised by aspects of serial vision, where the full extent of the north-south internal view within the site is not immediately revealed, thus piquing interest and inviting exploration of the site, whilst also helping to create a sense of enclosure and residential privacy.</p>
--	---

Table 16. Consistency of the proposed development with the Urban Design Manual.

6.14 Design Manual for Urban Roads and Streets (2019)

The proposed development involves the creation of a new street running east-west along the centre of the site from the junction between Kinsale Road and Mick Barry Road, and then north-south along three quarters of the length of site to the west of Buildings B, C and D (the latter being subject to a separate planning application for a primary care centre), with access to/from the proposed development also occurring via the pre-existing vehicular site access along Tramore Road. As part of the Traffic and Transportation Assessment and Mobility Management Plan Statement for the proposed development, Arup have prepared a DMURS Compliance Statement.

The DMURS Compliance Statement details how the proposed development complies with DMURS in that it creates a sense of place through connectivity, enclosure, active edge and pedestrian activity, and adheres to the following key design principles of DMURS:

- Design Principle 1: Connected Networks
This principle considers how the development is integrated with the surrounding street network, how it facilitates movement in terms of a street hierarchy, and how permeability and legibility are achieved.

The proposed development incorporates dense and permeable pedestrian and cyclist networks that align as closely as possible with the various desire lines, both within the proposed development and to and from key external destinations. Provision is made to connect the development to potential future development i.e. the Musgraves site to the west. Pedestrians traveling to and from the proposed development will have a variety of routes to choose from, ensuring that they can take the shortest route to their destination.

- Design Principle 2: Multifunctional Streets
Under this principle it is demonstrated how the proposed layout provides route choice and connection to focal areas. Adherence to footpath and cycle route widths are also demonstrated, as well as how verges are proposed along major routes. The principle also focusses on self-regulation of vehicle speeds and minimising air pollution from a transport point of view.

The internal street and road network and access junction are designed to ensure safe and comfortable co-existence of different street users. Where necessary, priorities have been established and assigned with respective design solutions such as wide footpaths, dedicated cycle lanes, various surface treatments,

pedestrian and cyclist crossings, raised tables at junctions, tight radii, traffic lights, road markings, and shared and segregated space areas.

Kinsale Road includes a variety of land uses and is developing into an activity spine where a mix of activities and land uses adjacent to the road attracts people from neighbouring residential areas and places of work. The placement of a high-density residential development along this route will encourage a larger variety of development to occur along this route and is also expected to have a positive impact on the turnover of business next to the route. Adding a residential development therefore creates a richer development strip where local demand is created, promoting shorter trips.

- Design Principle 3: Street Design-Pedestrian Focus

Aspects were considered such as how the development balances speed management with the values of place, and how the development promotes a reasonable balance between physical and psychological measures to regulate speed. The streetscape, street furniture and lighting, materials and finishes, on street parking, and loading and appropriate carriageway design and surfaces are outlined in the Traffic and Transportation Assessment and Mobility Management Plan Statement.

The internal street and road network has been designed to ensure convenient, safe, and comfortable movements for pedestrians in the first instance. This has been enhanced and ensured with the help of such design features as a continuous and integrated network of dedicated and wide footpaths along with signalised pedestrian crossings at the western access junction.

- Design Principle 4: Multidisciplinary Approach

The DMURS Compliance Statement demonstrates how the design of the development is a collaboration between the architect, the landscape architect and the traffic engineer.

All design elements of the internal street and road network were developed in line with requirements and limitations associated with other design elements of the development such as drainage, structures, utilities and landscape.

The proposed development thus delivers an environment that will promote sustainable transport modes by prioritising pedestrians and cyclists over private vehicles on its streets, as prescribed by DMURS. At the same time, the design also facilitates convenient and safe vehicular movements and manoeuvres necessary for the operation of the development.

6.15 Guidelines for Planning Authorities on Childcare Facilities (2001)

Although Appendix 2 of the Childcare Guidelines for Planning Authorities 2001 states an indicative standard of 1 childcare facility per 75 dwellings in new housing areas, this is no longer considered to be a practical benchmark. The 2020 Apartment Guidelines require that childcare facilities be provided in accordance with the demographic profile of the area and the existing capacity of childcare centres. The 2020 Guidelines also specifically state that *“one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and, subject to location, this may also apply, in part or whole, to units with two or more bedrooms”*.

A Childcare Needs Assessment of the proposed development has been prepared by Coakley O'Neill Town Planning Ltd. and accompanies this application. The assessment found that existing childcare facilities in the local area could not accommodate the anticipated demand for early years childcare spaces that the proposed development is likely to generate. As a result, the provision of an early years childcare facility as part of the proposed development was deemed necessary. A creche with a gross floor area of 289m² and associated outdoor crèche garden of 242m² is proposed on level 0 of Building F. The proposed creche can accommodate up to 63no. children.

6.16 Smarter Travel – A New Transport Policy for Ireland 2009-2020

The proposed development is located on an existing high frequency public bus route (Route 213: City Centre-Black Ash Park and Ride), a proposed BusConnects radial route under CMATS, and is within 15 minutes walking distance from five other public bus routes. All six existing bus routes are currently running below capacity. In addition, a Cork Metropolitan Area primary cycle route runs along the site's eastern boundary with Kinsale Road.

1,145no. bicycle parking spaces are proposed. Only 209no. car parking spaces are proposed for this primarily residential development, with an additional 98no. car parking spaces being proposed for the anticipated Primary Care Centre development on site (subject to a separate application). These car parking figures are at a significantly reduced level relative to the Cork City Development Plan standard (209no. spaces proposed versus an approximate maximum of 898 no. spaces for the mix of uses proposed).

In addition, it is envisaged that a car sharing company will have access to some car parking spaces located within the undercroft car park. The number of spaces to be allocated to the car sharing company will be determined at a later stage. The introduction of these spaces enables residents to have access to a car without the need to own a personal car. The provision of a car sharing scheme will support residents' transport needs as well as helping to ensure that the proposed development supports sustainable transport modes of choice.

The proposed development is thus consistent with the requirements of the Smarter Travel Policy.

6.17 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)

There are no historic flood events recorded within the proposed development site according to FloodInfo.ie. Notwithstanding, a Flood Risk Assessment (FRA) has been prepared and is included as an appendix to Chapter 14 of the EIAR which accompanies this planning application. The FRA finds that the risk of fluvial flooding from the nearby Tramore River is considered to be low. The risk of pluvial flooding, tidal flooding and groundwater flooding are also considered to be low.

In the event of a very extreme high-intensity rainfall event, the capacity of the drainage system for the proposed development could be exceeded leading to surface water/ponding on the site. Surface water attenuation structures will be incorporated into the surface water drainage system to attenuate the excess runoff in line with Cork City Council requirements.

Floodplain storage and conveyance will not be impacted by the proposed development and there will be no increase of flood risk off site. The site is located in Flood Zone C and so a Justification Test for the development is not required and it is necessary only to identify mitigation measures for any residual flood risk which has been described in the FRA.

6.18 Birds and Habitats Directives – Appropriate Assessment

The network of Natura 2000 sites across the EU is comprised of all designated sites that fall into one of two categories: Special Area of Conservation (SAC) and Special Protection Area (SPA).

The protection and conservation of Natura 2000 sites is provided for by means of both the *Habitats Directive 92/43/EEC* and the *Birds Directive 79/409/EEC*.

Article 6(3) of the Habitats Directive states that:

Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

The Habitats Directive has been transposed into Irish law, with the current relevant legislation being the *European Communities (Birds and Natural Habitats) Regulations, 2011*. Section 42(1) of Part 5 of these regulations states that:

A screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.

There is a source-pathway link receptor between the Cork Harbour SPA and the proposed development site via the Tramore River. The Tramore River is located circa. 80m to the south of the site and flows into the Cork Harbour SPA circa. 2.8km downstream. In addition, there is also a source-pathway link receptor via the Tramore River between the proposed development site and the Great Island Channel SAC which is further downstream in Cork Harbour.

A Stage 1 Appropriate Assessment (AA) Screening Report has been carried out to aid the Board in its determination as to whether or not a Stage 2 Appropriate Assessment is required. The AA Screening Report has been submitted as part of the planning application for the proposed development. Based on the nature and extent of the proposed development and the conservation interests of the two designated sites, a Natura Impact Statement (NIS) has been prepared for the proposed development.

The NIS finds that following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted effects from the proposed development and with the implementation of mitigation measures proposed, that the construction and operation of the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. There is no reasonable scientific doubt in relation to this conclusion.

6.19 Summary

In summary, the key national and regional policy issues the proposed development responds to are:

- **Climate change, which involves the protection and conservation of biodiversity and the transition to a low-carbon and climate resilient future;**
- **Compact growth on urban brownfield sites, which involves higher density developments and necessitates taller buildings in suitably appropriate locations;**
- **The chronic housing crisis and the need to achieve regional parity in the country, both of which involve dramatically increasing the supply of homes in the Cork metropolitan area;**
- **Encouraging modal shift, which involves increasing the incidences of public transport use, walking and cycling by being strategic in the locating of high-density residential development along public transport corridors as well as creating safe and pleasant open spaces and public realm infrastructure;**
- **COVID-19, which involves a “health in all designs” urban design strategy to facilitate activity and physical distancing;**
- **Sustainable neighbourhoods for all cohorts of the population, with access to quality services as well as enhanced public amenities, facilities and green infrastructure proximate to high-quality employment centres.**

7.0 Consistency with Local Planning Policy

7.1 Cork City Development Plan 2015-2021

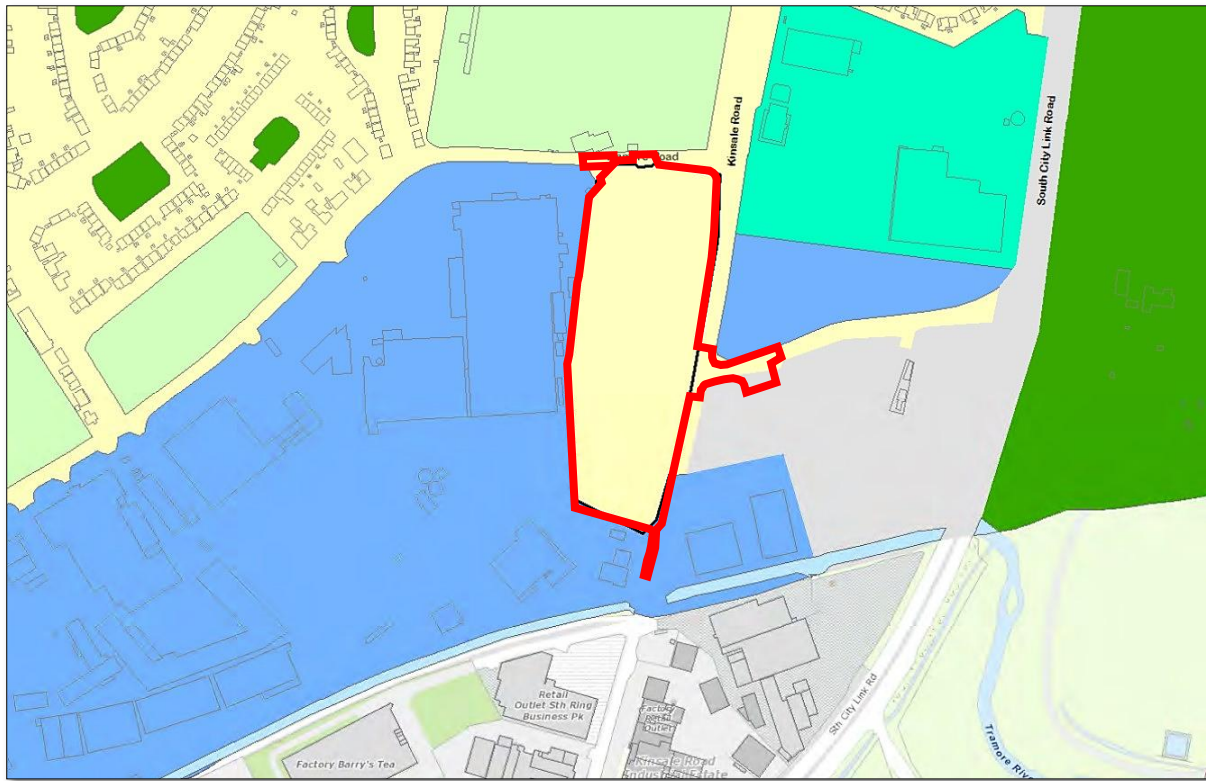


Figure 17. Proposed development site in relation to the Residential, Local Services and Institutional Uses zoning objective (site generally outlined in red). (Source: Proposed Variation No.6 (Tramore Road/Kinsale Road Site) to the Cork City Development Plan 2015-2021, Chief Executive's Report; Annotated by Coakley O'Neill, 2022).

Of significance for the proposed development is adopted **Variation No. 6 of the Cork City Development Plan 2015-2021**. On the 11th of November 2019, Cork City Council adopted Variation No. 6 of the *Cork City Development Plan 2015-2021*, which changed the zoning of the subject site from "Light Industry and Related Uses" to "Residential, Local Services, and Institutional Uses", with the corresponding zoning objective being as follows:

To protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to employment policies outlined in Chapter 3.

No revisions to the proposed variation were suggested in any of the submissions received by Cork City Council during the statutory public consultation period to vary the development plan.

Of particular note, the Office of the Planning Regulator's submission on the then proposed variation states the following:

The subject site is situated in an area identified for redevelopment and adjacent to a main arterial route to the City. The location is suitable for a mixture of uses as advocated by Policy Objective 14.5 (a) of the Cork City Development Plan and the Sustainable Residential Development in Urban Areas, Planning Guidelines

(2009), and is consistent with NPO 3(a) of the National Planning Framework which requires ‘the delivery of 40% of residential development within built-up footprints of existing settlements’.

Given the vacant nature, limited size, and the strategic location of the subject site, this Office would be supportive of the regeneration of this brownfield site which would accommodate new more intensive development, including residential development, close to existing local services and amenities. Such an approach would be in accordance with established national planning objectives, and legislation encouraging redevelopment of vacant sites and efficient use of well serviced urban land in built-up areas.

In addition, Cork City Council’s Chief Executive’s Report on this development plan variation states that:

- 1) The **Office of the Planning Regulator** states broad support for the variation, finding that the approach would be in accordance with established national planning objectives, and legislation encouraging redevelopment of vacant sites and efficient use of well serviced urban land in built-up areas.
- 2) The **Southern Regional Assembly** states that the proposed variation is consistent with the South West Regional Planning Guidelines 2010-2022. It further states that the proposed variation is also consistent with the draft Regional and Spatial Economic Strategy and with the Draft Cork Metropolitan Area Strategic Plan.

In addition, the Chief Executive’s Report concludes that:

Providing residential development on this centrally-located brownfield site would be in keeping with policies set out in the National Planning Framework and with objectives for redevelopment in the Tramore Road area as set out in the Cork City Development Plan 2015-2021. The proposed rezoning could facilitate further housing in the city, close to existing amenities. Given these factors, the proposed rezoning is considered to be in accordance with the proper planning and sustainable development of the area.

In addition to the subject site being appropriately zoned for “Residential, Local Services, and Institutional Uses”, other goals and objectives of the Cork City Development Plan 2015-2021 relevant to the proposed development are set out in Table 17 below.

Cork City Development Plan 2015-2021	Description of Objective
Goal 1	Increase population and households to create a compact sustainable city
Goal 2	Achieve a higher quality of life, promote social inclusion and make the city an attractive and healthy place to live, work, visit and invest in
Goal 4	Promote sustainable modes of transport and integration of land use and transportation
Goal 6	Tackle climate change through reducing energy usage, reducing emissions, adapt to climate change and mitigate against flood risk
Objective 5.1	Strategic Transport Objectives Contains 15 specific objectives aimed at, amongst other matters, greater consolidation of development along strategic corridors in the city, encouraging and facilitating modal shift, and to reduce the requirement for car parking.
Objective 5.2	Transport Assessment:

	<i>Planning applications for substantial developments (i.e. those that Cork City Council considers may have significant travel implications) shall include a Transport Assessment; the assessment shall demonstrate how sustainable transport patterns can be achieved by the development.</i>
Objective 5.3	<p><i>Travel Plans:</i></p> <p><i>Planning applications for new and significantly extended developments shall include a Travel Plan or a Travel Plan Statement in accordance with the following:</i></p> <ul style="list-style-type: none"> <i>a. Those with more than 100 employees shall include a Travel Plan;</i> <i>b. Those with approximately 25 – 99 employees shall include a Travel Plan Statement;</i> <i>c. A Travel Plan or Travel Plan Statement may also be required in association for any proposed development that Cork City Council considers may have significant travel implications; this includes non-employment uses such as significant educational and residential development.</i>
Objective 5.16	<p><i>Design Approach for Local Streets:</i></p> <p><i>Both the construction of new local streets as well as works to the existing local network shall be in accordance with principles, approaches, and standards set out in Design Manual for Urban Roads and Streets.</i></p>
Objective 5.21	<p><i>Electric Vehicle Charging:</i></p> <p><i>Cork City Council will promote and facilitate the use of Electric Vehicles, including the provision of both on and off- street charging points.</i></p>
Objective 6.1	<p><i>Residential Strategic Objectives:</i></p> <ul style="list-style-type: none"> <i>a. To encourage the development of sustainable residential neighbourhoods;</i> <i>b. To provide a variety of sites for housing to meet the various needs of different sections of the population;</i> <i>c. To continue to work with the Approved Housing Bodies and to actively engage with all key stakeholders in the provision of housing;</i> <i>d. To continue to regenerate and maintain existing housing;</i> <i>e. To encourage the use of derelict or underused land and buildings to assist in their regeneration;</i> <i>f. To promote high standards of design, energy efficiency, estate layout and landscaping in all new housing developments;</i> <i>g. To protect and, where necessary, enhance the amenities and the environment of existing residential areas.</i>
Objective 6.4	<p><i>Housing Provision:</i></p> <p><i>To support and facilitate the provision of housing through various sectors including private, voluntary and cooperative housing sectors. The Local Authority will continue to implement and operate a range of housing schemes and will continue to look at viable alternatives in the delivery of suitable accommodation for all.</i></p>
Objective 6.7	<p><i>Private Sector:</i></p> <p><i>The City Council will support the further expansion of the private owner occupier and private rented sectors to ensure the continuation of a range of housing choices in the city.</i></p>
Objective 6.8	<p><i>Housing Mix:</i></p> <p><i>To encourage the establishment of sustainable residential communities by ensuring a mix of housing and apartment types, sizes and tenures is provided. Planning applications for multiple housing units shall submit a Statement of Housing Mix detailing the proposed mix and why it is considered appropriate. The needs of special groups such as the elderly and disabled shall also be considered as part of this process.</i></p>
Objective 6.9	<p><i>Housing Density:</i></p> <p><i>To promote suitable densities to meet the needs outlined in the Core Strategy as set out in Chapter 16 Development Management.</i></p>

Objective 7.1	<p><i>Inclusive Neighbourhoods Strategic Objectives:</i></p> <ul style="list-style-type: none"> a. <i>To support provision of appropriate community facilities and services for all, young, the ageing population, able-bodied, disabled etc.</i> b. <i>To support the provision by voluntary and state agencies of a wide range of community facilities.</i> c. <i>To facilitate and support existing and proposed educational facilities.</i> d. <i>To support dual use of community facilities.</i> e. <i>To encourage the provision of suitably sized health care facilities located close to communities serving a sufficient catchment and accessible by public transport.</i> f. <i>To ensure that social inclusion objectives are fully integrated into planning policy.</i> g. <i>To support the particular needs of an area in terms of provision of childcare whether it is to be a crèche facility/pre-school/after-school etc.</i> h. <i>To consider the child as a citizen of Cork City.</i> i. <i>To work to ensure Cork City is a family friendly city.</i> j. <i>To consider cultural diversity and ethnic minorities in planning for the needs of communities.</i> k. <i>Continue to encourage active public participation in the Planning process.</i> l. <i>To encourage socially inclusive and safe communities.</i> m. <i>To consider the needs of groups with specific design/planning needs in the formation of policy documents.</i> n. <i>To make Cork a sustained healthy city in which to live, work and visit.</i>
Objective 7.2	<p><i>Sustainable Neighbourhoods:</i></p> <p><i>To support the creation of sustainable neighbourhoods which allow access to services and facilities for all users and to foster a sense of community and a sense of place.</i></p>
Objective 7.4	<p><i>Social Inclusion:</i></p> <p><i>c. To support urban regeneration in areas across the city in order to enhance social cohesion.</i></p>
Objective 7.6	<p><i>Cork City as a Child-Friendly City:</i></p> <p><i>To promote Cork as a child-friendly city by considering the needs of children in terms of appropriate design when changes are proposed to the built environment.</i></p>
Objective 7.7	<p><i>Childcare Facilities:</i></p> <p><i>Cork City Council will support the provision of high quality childcare facilities throughout the city suited to the needs of the given area and will:</i></p> <ul style="list-style-type: none"> <i>i) Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered;</i> <i>ii) Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed;</i> <i>iii) Require employers with more than 500 members of staff to provide childcare facilities as part of planning applications for significant new and extended development.</i>
Objective 7.15	<p><i>Neighbourhood Recreation & Amenity:</i></p> <p><i>a) To support and facilitate the development of outdoor and indoor recreational facilities to cater for all age-groups on suitable sites.</i></p>
Objective 7.18	<p><i>Safe City:</i></p> <ul style="list-style-type: none"> <i>a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas;</i> <i>b. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.</i>
Objective 10.1	<p><i>Landscape Strategic Objectives:</i></p> <p><i>To preserve and enhance Cork's landscape character and key landscape assets.</i></p> <p><i>To preserve and enhance Cork's views and prospects of special amenity value.</i></p>

Objective 10.2	<p><i>Cork City Landscape:</i> <i>To preserve Cork’s unique and distinctive landscape character through the appropriate management and enhancement of Key Landscape Assets, (as set out in Table 10.1).</i></p>
Objective 10.3	<p><i>Cork City Landscape Structure Plan:</i> <i>To preserve and enhance Cork’s landscape and where appropriate, to increase access to and utilise the landscape for recreational purposes through the implementation of the Landscape Structure Plan.</i></p>
Objective 11.1	<p><i>Recreational Infrastructure Strategic Objectives:</i> <i>It is the policy of Cork City Council:</i></p> <ul style="list-style-type: none"> <i>a. To ensure that the City has an Open Space Strategy that is fit for purpose;</i> <i>b. To ensure, in partnership with Cork County Council where appropriate, that Cork has a well-balanced provision of parks and larger open spaces to provide focal points for the city and its constituent neighbourhoods, with each park accommodating a range of activities suited to its context and purpose;</i> <i>c. To ensure that all areas of the city have an appropriate provision of local public amenity space and facilities to enable people of all ages to recreate, meet, enjoy and contribute to improved health;</i> <i>d. To ensure that play provision meets the needs of all age groups to best practice standards in terms of quantity, quality and accessibility;</i> <i>e. To ensure that playing pitch and active sports infrastructure meets the needs of Cork’s population;</i> <i>f. To ensure that Cork has a supply of allotments to meet the needs of the community;</i> <i>g. To ensure that the network of green infrastructure linkages are protected and enhanced to provide for movement and ecological networks, and that open spaces are designed to maximise their biodiversity so that people have access to nature close to where they live;</i> <i>h. To ensure that streets within the city fulfil their potential as public space as well as movement corridors;</i> <i>i. To ensure that the city’s open space and recreational assets are managed effectively, efficiently and smartly so that the maximum benefit for all in the common good can be gained from them, given finite space within the city and the finite monetary resources available.</i>
Objective 11.7	<p><i>Public Open Space:</i></p> <ul style="list-style-type: none"> <i>a. To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned public open space for alternative purposes;</i> <p>and</p> <ul style="list-style-type: none"> <i>c. To promote public open space standards generally in accordance with national guidance contained in Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG, 2009) and the accompanying Urban Design Manual – A Best Practice Guide;</i> <i>d. The development of open spaces should aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community;</i> <i>e. To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities;</i> <i>f. Specific design outcomes should be framed in relation to the nature of spaces being created or enhanced (e.g. in relation to maintenance, nature exposure and connectivity, strategic landscape and social role).</i>
Objective 11.15	<p><i>Children’s Play Facilities:</i> <i>To seek the provision of children’s play facilities in new developments and particularly in new larger residential developments of 75 units and over. Facilities for young children aged 0-5 should be provided</i></p>

	<i>within easy walking distance of homes or within the cartilage of apartment buildings. Older children should have access to larger equipped play areas within 5 minutes walk of home.</i>
Objective 12.3	<i>Sustainable Urban Drainage Systems: Planning applications shall include proposals for managing stormwater in accordance with details set out at www.irishsuds.com (unless superseded by policies and standards set out in the adopted "Storm Water Management Plan per Objective 12.2) and shall minimise and limit the extent of hard surfacing and paving.</i>
Objective 12.19	<i>External Lighting: To require that the design of external lighting minimises the incidence of light spillage or pollution on the surrounding environment and results in no adverse impact on residential amenities or distraction to road users. Development proposals that require lighting of outdoor areas shall be required to include details of external lighting scheme and proposed mitigation measures.</i>
Objective 14.5	<i>Tramore Road/Kinsale Road: a. To develop a vision for the future of the area; including identifying a suitable mix of uses and appropriate quantum of development, taking into account the need to retain locations for light industry while facilitating suitable reuse of vacant and underutilised land; b. To co-operate with Cork County Council in devising a co-ordinated approach to the future development of the adjoining areas on each side of the administrative boundary; c. To take account of transport and access issues including potential impact on the adjoining national road and the provision of sustainable modes of transport.</i>
Objective 16.1	<i>Design Statement: All significant planning applications shall submit an accompanying design statement which provides a framework explaining how a proposed development is a suitable response to the site and its setting.</i>
Objective 16.2	<i>Visual Impact Assessment: All significant planning applications shall submit an accompanying visual impact assessment.</i>
Objective 16.3	<i>Urban Design: - To deliver high quality built environments through good place making; - To ensure that development is designed to high qualitative standard and is cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking and detailed design.</i>
Objective 16.4	<i>Skyline and Roofscapes: The City Council will seek new buildings to be designed to: - enhance the roofscape in terms of their bulk, massing, materials and aesthetics; - where appropriate, divide building mass into smaller elements which respect the existing cityscape and the setting and views and prospects of landmark buildings and the other special amenity views; - where appropriate locate plant housing for buildings in basements to avoid impact on views of cityscape.</i>
Objective 16.9	<i>Sustainable Residential Development: Residential developments shall be sustainable and create high quality places and spaces which: a. Deliver a quality of life which residents and visitors are entitled to expect in terms of amenity, safety and convenience; b. Provide adequate open space which are practical in terms of scale and layout and naturally supervised by the aspect of the dwellings it serves; c. Provide a good range of suitable facilities; d. Prioritise walking, cycling and public transport and minimise the need to use cars e. Present an attractive appearance with a distinct sense of place; f. Are easy to access and navigate;</i>

	<p><i>g. Promote the efficient use of land in terms of density and plot ratio;</i></p> <p><i>h. Promote social integration and provides accommodation for a diverse range of household types and age groups;</i></p> <p><i>i. Enhance and protect the built and natural heritage.</i></p>
--	---

Table 17. List of objectives of the Cork City Development Plan 2015-2021 relevant to the proposed development.

Having regard to these objectives, the proposed development:

- **Will comply with the Z0 4 Residential, Local Services and Institutional Uses zoning objective for the site (see Figure 16 above), which supports the protection and provision of residential uses, local services, institutional uses, and civic uses, having regard to the Plan’s employment policies.**
- **Will result in an increased population that will contribute to the realisation of a compact, sustainable city (Goal 1) and will assist in meeting the target 30,770 population for Cork (Table 2.1 of the Plan).**
- **Will result in a distinctive, landmark development that signals itself and Cork City as being an attractive, high-quality place to live and visit (Goal 2).**
- **Will deliver a new high-density, primarily residential neighbourhood hub along an existing as well as planned high-frequency public transport corridor that encourages, through its design and facility provision, cycling, walking and public transport use as the preferred modal choices (Goal 4).**
- **Will provide sustainability best practice in terms of design and construction to create spaces that deliver net positive impacts environmentally, socially and economically, including the use of SUDS, the planting of 505 no. new trees including native woodland species, and other planting throughout the scheme of native and high value non-native species in line with the All-Ireland Pollinator Plan to support biodiversity on site (Goal 6).**
- **Will contribute to the achievement of Objective 5.1 of the Plan, in particular:**
 - 5.1b, which seeks to reduce the percentage of persons who drive to work;
 - 5.1d, which seeks to encourage and facilitate cycling and walking for short/local trips by providing appropriate infrastructure, promoting “soft-measures” that influence change in transport behaviour, and by encouraging proximate, compact land uses, and;
 - 5.1i which seeks to provide new local roads, streets, upgraded streets, and pathways where required to increase connectivity. A Traffic and Transport Assessment and Mobility Management Plan has been prepared (copies of which accompany the planning application) in line with Objective 5.2, and ensures that electric vehicles are catered for, in line with Objective 5.21, as well as disabled and motorcycle parking facilities, in line with Table 16 of the Plan which details the Plan’s car parking standards.
- **Is consistent with Objective 5.16 of the Plan in that the proposed development complies with DMURS (as is detailed in the DMURS Compliance Statement which accompanies the planning application).**
- **Is consistent with Objectives 5.2 and 5.21 of the Plan in that its design is informed by a Traffic and Transportation Assessment and Mobility Management Plan, and EV charging equipped parking has been included in the design.**

- Is consistent with Objective 6.1 of the Plan, as it will: encourage the development of sustainable residential neighbourhoods; encourage the use of derelict and underused land and buildings for regeneration purposes; will deliver high standards of design, energy efficiency, layout and landscaping; and will protect and enhance the amenities and the environment of existing residential areas.
- Responds to the demand for more residential units accommodating fewer people (paragraph 6.18 of the Plan) and provides a mix of apartment types in a high-density development, in accordance with Objectives 6.8 and 6.9 of the Plan.
- Will deliver additional private rented accommodation with a mix of typologies and sizes and at an appropriate density in line with Objectives 6.4, 6.7, 6.8 and 6.9 of the Plan.
- Will deliver a sustainable neighbourhood in an area identified as having potential for intensification of development and will thus contribute to the developing of a vision for the future of the area, consistent with Objectives 7.2, 14.5 and 16.9 of the Plan.
- Will deliver an inclusive neighbourhood that has accessible, appropriately sized accommodation with facilities, supports, amenities and recreational public open space on site in a development that has passive surveillance and permeability designed into it, consistent with Objectives 7.1, 7.7, 7.15, 7.18, 11.1, 11.5 and 11.7 of the Plan.
- Will support the urban regeneration of the Tramore Road/Kinsale Road area, consistent with Objectives 7.4 and 14.5 of the Plan.
- Will enhance the landscape assets of this gateway location in a key area along a key approach road (see Figure 17 below) by delivering a landmark tall building as part of a high-quality, distinctive development, consistent with Objectives 10.1, 10.2 and 10.3 of the Plan.
- Incorporates SUDS measures in accordance with Objective 12.3 of the Plan.
- Responds to Objective 12.19 of the Plan and details of the external lighting scheme and associated proposed mitigation measures have been prepared by EDC and submitted as part of the planning application.
- The proposed development has been subject to an Architectural Design Statement, which incorporates an Urban Design Statement, and a Landscape and Visual Impact Assessment (please refer to Chapter 12 of the accompanying EIAR) in accordance with Objectives 16.1, 16.2 and 16.3 of the Plan. The statements and the drawings that accompany this application demonstrate how the proposed development has been designed in accordance with Objective 16.4 of the Plan.

According to the *Cork City Development Plan 2015-2021*, the following maximum car parking standards apply to the proposed development:

- Residential (1-2 bedroom) – 1 space + 0.25 visitors parking per unit

- Residential (3-3+ bedroom) – 2 spaces +0.25 visitors parking per unit
- Creche – 1 space per 6 students
- Café/restaurant – 1 space per 20m² net floor area
- Convenience Retail – 20 spaces

In addition, the current Development Plan requires that development providing 10 or more parking spaces must provide at least 1 parking space equipped with a functioning EV charging point and at least 10% of spaces must incorporate ducting to allow for future fit out of a charging point. Apartment developments should also provide 1 motorcycle parking space for every 10 car spaces, 5% of car parking spaces provided should be set aside for disabled car parking, and bicycle parking should be provided as follows:

- 0.5 per suburban apartment
- 1 per 100m² of convenience retail gross floor area
- 1 per 200m² of café/restaurant gross floor area
- 1 per 150m² of fitness centre/sports centre gross floor area
- 1 per 25 children enrolled at a creche

The proposed development involves the provision for a total of 209 no. car parking spaces and 1145 no. sheltered bicycle parking spaces to serve all of the proposed uses. The parking proposals align with more up-to-date policy, such as the NPF and the Apartments Guidelines 2020, as well as Smarter Travel policy aimed at encouraging modal shift.

High levels of sustainable transport use at the proposed development site will be supported by the fact that the site is well located in terms of six existing bus services, currently running below capacity, being within 15 minutes' walk, and future (Bus Connects) public transport access and that many local facilities (i.e. shops, schools, community facilities, etc.) are located nearby. In addition, the proposed development also provides a range of services on site including retail, a gym, café, health care and community facilities which reduce the need for longer distance travel.

The proposed development will provide 21 no. EV charging equipped spaces and 21 no. motorcycle parking bays, with disabled parking spaces also being provided in line with the Development Plan requirements.

Regarding residential density, paragraph 16.41 states that in suburban city areas, residential density greater than 50 units/ha will be appropriate at locations along bus routes and on larger development sites (>0.5ha) capable of generating and accommodating their own character. The subject site is consistent with both of these requirements.

It is acknowledged in paragraph 16.34 of the Cork City Development Plan (page 240) that tall buildings will be resisted in areas of special and/or significant character in the city, to include the suburban areas of the city (apart from locations specified in the Plan) and that the proposed development is not in one of those suburban locations specified in the Plan as being suitable for tall buildings.

However, it is also noted that paragraph 16.37 of the Plan states that *"tall buildings will normally be appropriate where they are accessible to a high quality public transport system which is in operation or proposed and programmed for implementation"*.

In addition, paragraph 16.38 of the Plan states that:

Tall buildings should always be of high design quality to ensure that they fulfil their role as strategic landmarks. As well as having a positive impact on Cork's skyline and built environment, tall buildings can have negative impacts also. These impacts will need to be assessed in any planning application and can include: relationship to context; the effect on the whole existing environment; the relationship to transport infrastructure; the architectural quality of the building; sustainable design and construction; the credibility of the design; the contribution to public spaces and facilities; the effect on the local environment; the contribution made to the permeability of the environment and the provision of a high quality environment.

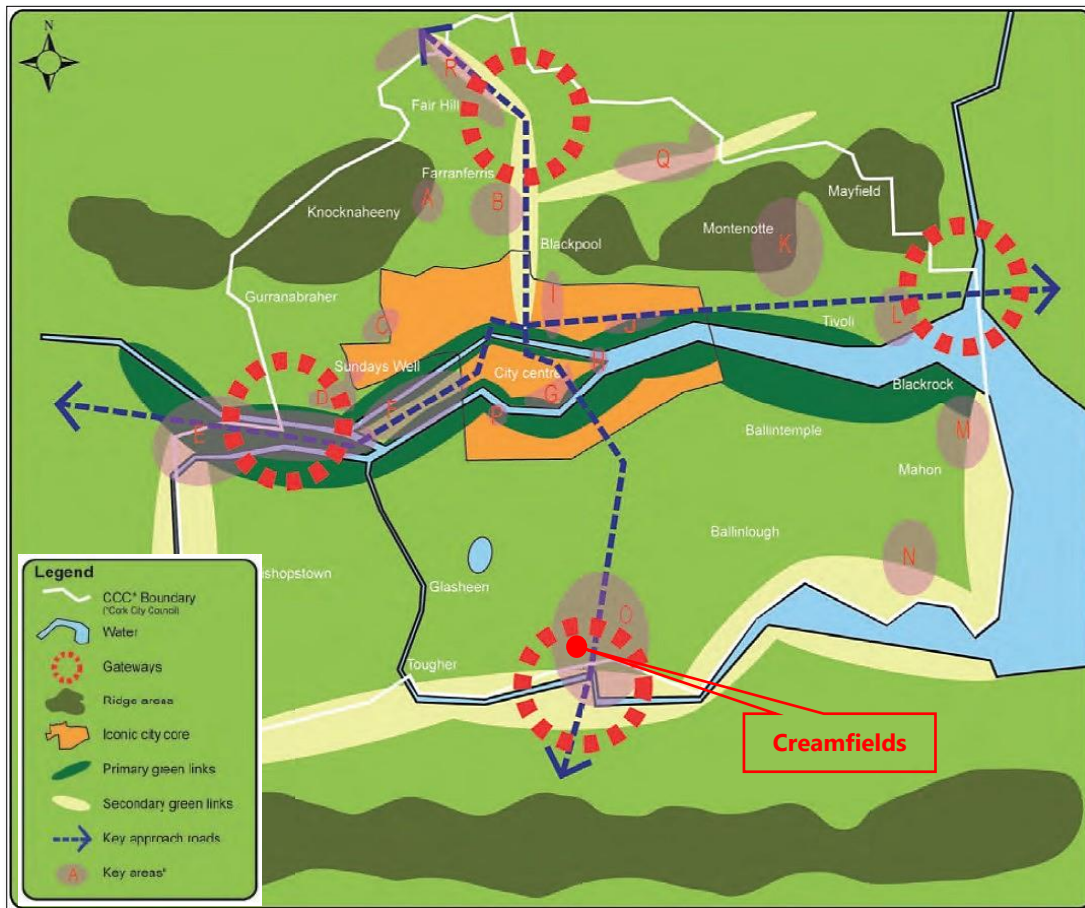


Figure 18. Cork City Development Plan's "Conceptual Landscape Structure Plan". The subject site of the proposed development is located in an area designated as a "gateway to the city" along a "key approach route". (Source: Cork City Development Plan 2015-2021; Annotated by Coakley O'Neill Town planning Ltd. 2021).

It is further acknowledged that paragraph 16.43 of the Plan states that policies setting out the need for a mix of dwelling sizes are set out in paragraph 6.19 and Objective 6.8 Housing Mix, with Table 16.4 "Indicative Targets for Dwelling Size and Distribution" setting out the following:

Existing Household mix		Dwelling size distribution targets	
Household size	House size	Zones*	
		Zone 1 and Zone 2 and all Apartment / Duplex schemes	Zone 3 (Suburbs) (mixed house / apartment schemes)
1 Person	1 Bed	Max 15%	Max 20%
2 Person	2 Bed	Max 50%	Min 30%
3 Person	3 / 3+ Bed	Min 35%	Min 50%

4 Person		
5 Person		
Total	100%	100%

Table 18. Indicative Targets for Dwelling Size and Distribution as per the Cork City Development Plan 2015-2021. *Zones defined in Figure 16.1 and on Map 11 of Volume 2.

However, Goal 1 of the Plan states that *“household size has declined in line with national trends”*, with acknowledgement of this decline being reiterated in para 2.12 of the Plan.

Furthermore, it is noted that para 6.18 of the Plan states the following: *“The average number of persons in Cork City households is 2.45 persons. This is down from 2.61 in the 2006 Census. The demand is for more units accommodating fewer people. The provision of a range of housing types and sizes in the city will increase in importance as trends continue to show a decline in family housing and an increase in elderly and single person households. The predominant household size in Cork City is 2-person households which accounts for 32% of all household types, followed by 1-person households (29%) (Census 2011).”*

The proposed dwelling mix is as follows:

- 1-bed 31%
- 2-bed 55%
- 3-bed 8%
- 4-bed 6%

The issues of height, density and housing mix are addressed in the Statement of Material Contravention, prepared by Coakley O’Neill Town Planning Ltd., which accompanies the planning application.

7.2 Draft Cork City Development Plan 2022-2028

The Cork City Development Plan review process is currently underway. A new Draft Development Plan was published in July 2021, with the period of public consultation on that Plan ending in early October. The Chief Executive’s Report, containing proposed amendments to the Draft Plan, was published on 20th December 2021, with the Elected Members having until mid-March to consider the proposed amendments. Should a new Development Plan be adopted while this SHD application is under consideration by the Board, the application would be subject to compliance with the new Plan.

Under the *Draft Cork City Development Plan 2022-2028* the subject site is zoned ZO 02 “New Residential Neighbourhoods” with the zoning objective being as follows:

To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.

The proposed development site is also explicitly designated as a Tier 1 site, as per Figure 2.21 of the Draft Plan. Section 12.13 of the Draft Plan explains that Tier 1 lands are zoned, serviced lands, the development of which can easily be facilitated within the lifetime of the Plan.

The subject site is located just south of an existing Neighbourhood Centre at Tory Top Road and a proposed Neighbourhood Development Site on the site of the former Vita Cortex plant. The site of the former Vita Cortex plant is located approximately 230m north of the proposed development site.

Section 10.336 of the Draft Plan states the following with regard to the Tramore Road/Kinsale Road area:

The mixed industrial / commercial area centred on the Tramore Road and Kinsale Road has regeneration potential with higher density development, linked to the development of high quality public transport.

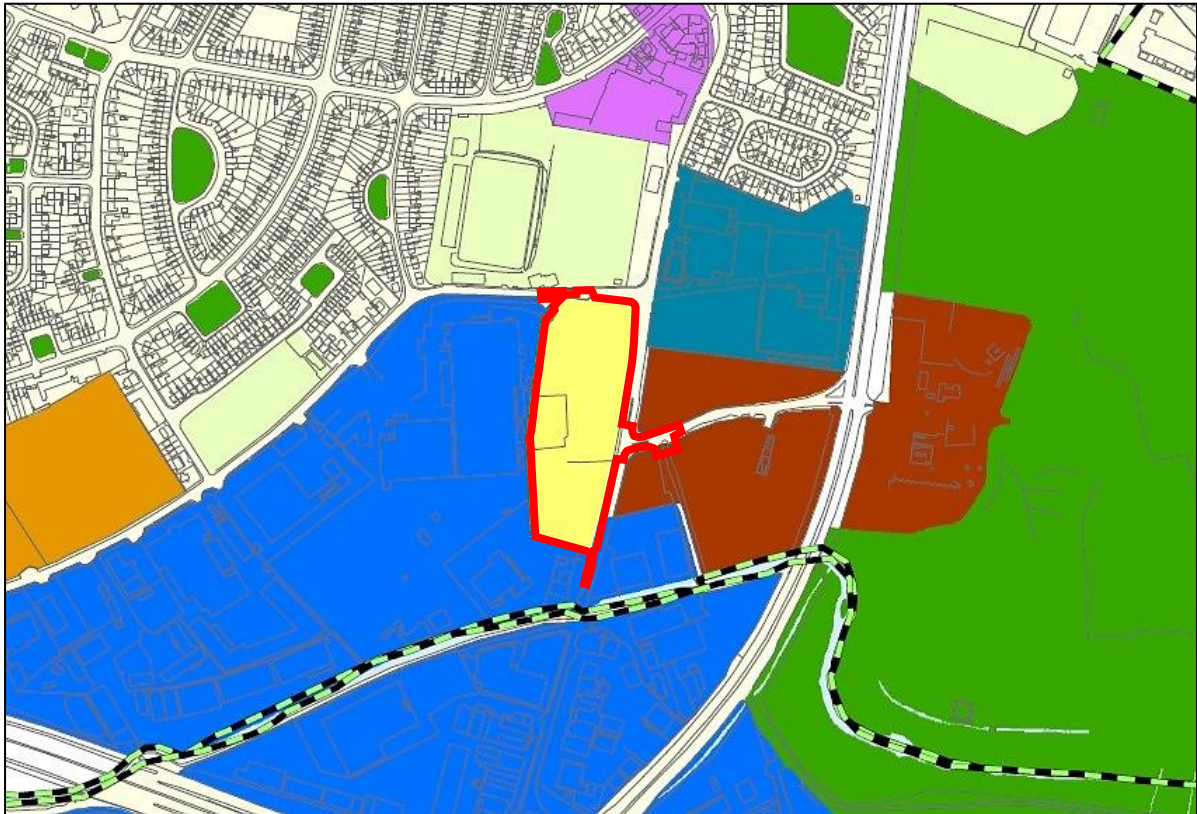


Figure 19. Excerpt from Map 7 of the Cork City Draft Development Plan 2022-2028. Subject site generally outlined in red. (Annotated by Coakley O'Neill Town Planning Ltd., 2022).

The proposed residential development, with its mix of uses, as well as the contemporaneous proposal for a primary care centre on the same site (subject to a separate planning application), is thus fully in line with the draft zoning objective for the site as well as the vision for high-density regeneration to occur in the area generally.

In addition, with regard to the site of the former Vita Cortex plant, paragraph 10.354 of the Draft Development Plan states that Neighbourhood Development Sites are considered to have the potential to provide local benefit to the local neighbourhood and act as catalyst developments. The proposed use of the former Vita Cortex site, according to the Draft Development Plan, is for mixed use development including residential and convenience retail. This is further evidence of the fact that the immediate area surrounding the subject site is in transition from a former pattern of light industrial land use towards that of a residential neighbourhood. Therefore, the proposed development can be understood as supporting this new paradigm.

The proposed development clearly aligns with and supports the following key strategic principles of the Strategic Vision of the *Draft Cork City Development Plan 2022-2028*:

- Compact growth
- A city of neighbourhoods and communities
- Sustainable and active travel
- A resilient city
- A healthy, inclusive and diverse city
- A connected city

The subject site is located in Inner Urban Suburb 5, “South Link Road Corridor”, an area identified for an uplift in existing residential density and building height from the current low intensity uses. According to Table 11.2 of the Draft Development Plan, this area is identified as being suitable for densities of 50-100 units/ha and heights of 3-4 storeys.

Section 4 “Building Heights Analysis” of the *Cork City Urban Density, Building Height and Tall Building Study*, a constituent part of the Draft Cork City Development Plan, sets out a methodological approach designed to determine areas considered to be most suitable for taller buildings, which can be summarised as follows:

- Access to services
- Proximity to green and blue infrastructure
- Proximity to railway stations
- Proximity to “normal” bus services
- Proximity to community facilities
- Identified opportunity areas (including those identified under CMATS)
- Proximity to high frequency bus services
- Proximity to the planned Light Rail Transit (LRT)

In acknowledging that a tension exists between physical characteristics and policy framework, Section 3 of the study states that the building height and density strategy prepared for Cork City has been developed and arrived at:

*in the knowledge that some **informed judgements will also need to be made to reflect on local circumstances when considering suitability for different forms of development and proposed densities on a case by case basis.** [emphasis added]*

Section 7 “Density Done Well” of the study presents clear evidence that densities of between 52-274 units/ha are appropriate in Inner Urban Suburb locations. The planning history of Cork City outlined in Section 3 of this report above also highlights that higher residential densities well in excess of 100 units/ha are routinely considered acceptable in inner suburban and, indeed, outer suburban locations in the city. The issue of density is addressed in the Statement of Material Contravention, prepared by Coakley O’Neill Town Planning Ltd., copies of which accompany the planning application.

Paragraph 11.42 of the Draft Development Plan states the following:

Whilst high density does not imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

The Building Height Guidelines (2018) require that local planning authorities identify in their development plans “areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development” (SPPR 1) to secure NPF and RSES objectives.

With regard to the preparation of development plans, paragraph 2.11 states the following:

Locations with the potential for comprehensive urban development or redevelopment (e.g. brownfield former industrial districts, dockland locations, low density urban shopping centres etc) should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct. Such areas, particularly those in excess of 2 ha (approx. 5 acres) in area, should be accompanied by appropriate master-planning exercises and local planning frameworks to deal with movement, public realm, design and other issues that are best addressed at a neighbourhood level rather than at an individual site scale.

SPPR 1 of the Guidelines is explicit that, in their development plans, planning authorities “shall not provide for blanket numerical limitations on building height”.

The tip of the city centre island and Docklands areas of the city are identified in the Draft Plan as being appropriate locations in Cork city for tall buildings. The rationale is that these areas are suitable for the highest forms of high-density development and that the areas inherently lack sensitivities. On this basis, the same can be said for the location of the proposed development – it is a large, vacant brownfield site located along a strategic public transport corridor, unencumbered by environmental or other sensitivities, such as protected views. The issue of height is addressed in the Statement of Material Contravention, prepared by Coakley O’Neill Town Planning Ltd., copies of which accompany the planning application.

Section 2.40 of the Draft Development Plan states that while the national average household size is 2.75, Cork City has a smaller average household size of 2.63. Figure 2.17 of the Draft Plan illustrates that for the South West Suburbs of the city – where the site of the proposed development is located – the average household size is smaller again, being 2.55. It must be noted that this figure is based on 2016 Census data.

Section 2.41 of the Draft Plan acknowledges that average household size will continue to decrease over the lifetime of the Plan, and states that the Joint Cork Housing Strategy and Housing Need Demand Assessment strategy (HNDA), “sets out a city-wide average household size target of 2.49 for the Plan period based on a changing average household size from 2022-2028.”

Section 3.35 of the Draft Development Plan states that Build-to-Rent schemes will not be subject to dwelling mix requirements.

Table 3.4 of the Draft Plan is based on Table 4-26 of the HNDA and indicates that, over the lifetime of the Plan, an additional 4,268 1-person and 5,060 2-person households will require homes, as well as 3,042 3-person households. However, section 5.4.4.4 of the HNDA states that, in respect of the South-West Suburbs, just c. 926 additional residential units are proposed over the lifetime of the Plan.

It is noted in the Chief Executive’s Report published on 20th December 2021, that the Tramore Road/Kinsale Road is proposed to form part of the Airport City Gateway long-term strategic regeneration area, for which a Framework Plan may be prepared.

It is also of note that the proposed development site is zoned as Z02, New Residential Neighbourhoods. This confirms that the area in the vicinity of the proposed development site is accepted as having significant capacity to contribute to the achievement of the ambitious population growth targets for Cork set out in the NPF and RSES. This also confirms that the proposed development site, being of sufficient scale, located along existing and planned sustainable transport routes, will be a catalyst for the future wider regeneration of the area, as envisaged in Variation no. 6 to the current City Development Plan. The site of the proposed development is also the largest available site in the area capable of accommodating significant residential use. Accordingly, the scale of residential development being proposed for the site can be considered appropriate.

Table 11.8 of the Draft Development Plan presents the dwelling size mix for housing developments in the city suburbs and is as follows:

	Min	Max	Target
Studios/ PBSA (at LRT Stops/ Urban Centre/ HEI Campus Only)	0%	15%	10%
1 Bedroom	15%	25%	20%
2 Bedroom	25%	40%	34%
3 Bedroom	18%	28%	28%
4 Bedroom/ Larger	5%	15%	8%

Table 19. City Suburbs Dwelling Size Mix for Housing Developments standards as per the Draft Cork City Development Plan 2022-2028.

The fact that the average household size in the South-West suburbs is smaller than the national average, as well as the fact that, as discussed in Section 6.12 of this report, Cork is seriously underperforming in respect of the delivery of new housing, and specifically apartments, provides the rationale for providing a higher proportion of 1- and 2-bedroom dwellings as part of the proposed development. As the planning history of Cork City also reveals, the dwelling mixes of schemes considered as acceptable are very much assessed and found to be so on a case-by-case basis, with a wide variety of dwelling mixes previously permitted, depending on the site location and specific scheme.

The issue of dwelling mix is addressed in the Statement of Material Contravention, prepared by Coakley O’Neill Town Planning Ltd., copies of which accompany the planning application.

Table 11.11 of the Draft Plan states that the general provision for public open space for the proposed development is 10%. The proposed development provides for more than double this amount, with 23% of the site designed as public open space.

Para 11.115 of the Draft Plan requires all large development proposals to be accompanied by a phasing schedule, while para 11.116 of the Draft Plan states the following:

Developments over 100 residential units shall demonstrate that adequate provisions for specified physical and social infrastructural requirements, including roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support the development.

As detailed in the Construction and Environmental Management Plan (CEMP) prepared by Arup, copies of which accompany this planning application, following an initial site development works phase of approx. 4 months in duration, the proposed development will be constructed over 4 no. phases. These phases are detailed in the CEMP as well as above, in Section 5.2 of this report.

In addition, a Social and Community Audit (SCA) has been prepared by Coakley O'Neill Town Planning, copies of which accompany the planning application. The SCA demonstrates that, with the exception of childcare for pre-school children, adequate social infrastructure is/ will be available available in the area to serve the proposed development.

Para 11.224 of the Draft Plan stipulates that the layout of proposed new residential developments must be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS). As outlined above in Section 6.14 of this report, a DMURS Compliance Statement has been prepared in respect of the proposed development and is contained in the Traffic and Transportation Assessment and Mobility Management Plan Statement for the proposed development prepared by Arup.

According to para 11.234 of the Draft Plan, the site of the proposed development is located in Zone 2. As a result, the following maximum car parking standards apply:

- Residential (1-2 bedroom) – 1 space per unit
- Residential (3-3+ bedroom) – 2 spaces per unit
- Creche – 1 space per 10 students
- No parking is required for cafés or restaurants
- Convenience Retail – 1 space per 50m² of gross floor area

In addition, the Draft Plan requires that multi-unit residential developments should provide a minimum of 1 EV equipped parking space per 5 car spaces, that apartment developments should provide 1 motorcycle parking space for every 10 car spaces, and that 5% of car parking spaces provided should be set aside for disabled car parking.

According to the Draft Plan, sheltered bicycle parking should be provided at a rate of:

- 0.5 per suburban apartment
- 1 per 100m² of convenience retail gross floor area
- 1 per 200m² of café/restaurant gross floor area
- 1 Per 150m² of fitness centre/sports centre gross floor area
- 1 per 25 children enrolled at a creche

As explained previously in this report, the provision of car parking as part of the proposed development is below the maximum standards cited above, to encourage modal shift. This is in tandem with the provision of a significant number of sheltered bicycle parking spaces.

In the event that the Draft Plan is adopted during the assessment timeframe of this planning application, some of the key Objectives of the Draft Plan which would apply to the assessment of the proposed development are set out in Table 20 below.

Draft Cork City Development Plan 2022-2028	Description of Objective
Strategic Objective 1	<p><i>Compact Liveable Growth</i> Deliver compact growth that achieves a sustainable 15-minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city.</p>
Strategic Objective 2	<p><i>Delivering Homes and Communities</i> Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.</p>
Strategic Objective 3	<p><i>Transport and Mobility</i> Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.</p>
Strategic Objective 4	<p><i>Climate and Environment</i> Transition to a low-carbon, climate-resilient and environmentally sustainable future. Implement climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigate and adaptation.</p>
Strategic Objective 5	<p><i>Green & Blue Infrastructure, Open Space and Biodiversity</i> Manage and enhance green and blue infrastructure, to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.</p>
Strategic Objective 9	<p><i>Placemaking and Managing Development</i> Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhood.</p>
Objective 2.2	<p><i>National Planning Framework Targets</i> Cork City Council will align with the National Planning Framework (NPF) to achieve the ambitious growth targets set out for Cork City and Metropolitan Area up to 2040. The Council will apply local planning policy approaches in combination with active land management measures to help achieve these targets.</p>
Objective 2.3	<p><i>National Development Plan Investment</i> Cork City Council will actively support the planning, design and delivery of capital investment in the National Development Plan (NDP) and other investment programmes that maximise delivery of infrastructure-led growth, deliver compact liveable growth and climate action to make the city an attractive, diverse and resilient place to live.</p>
Objective 2.4	<p><i>Cork Metropolitan Area Strategic Plan</i> To develop Cork City in a manner that strengthens the role of the Cork Metropolitan Area as an international location of scale and a primary driver of economic and population growth in the Southern Region.</p>
Objective 2.6	<p><i>Strategic Objectives</i></p>

	<i>Prioritise the development of areas in accordance with the 9 Strategic Objectives (SO's) of the Core Strategy, as set out in Table 2.1, including areas which are experiencing and/or are likely to experience large scale development or regeneration within the plan period.</i>
Objective 2.8	<i>The 15-Minute City To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability.</i>
Objective 2.9	<i>Low Carbon City Support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City's environmental assets.</i>
Objective 2.10	<i>Mix of Uses Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.</i>
Objective 2.11	<i>Design-Led City Follow a design-led approach that delivers sustainable, high quality placemaking. Development shall contribute positively to the quality of the surrounding built and natural environment and shall be planned and designed with reference to climate change mitigation and adaptation.</i>
Objective 2.12	<i>Walkable Neighbourhoods New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:</i> <ol style="list-style-type: none"> <i>a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.</i> <i>b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).</i> <i>c. Ensuring a child friendly and age friendly environment with a mix of household types.</i> <i>d. Designing a safe place that enables access for all.</i> <i>e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.</i> <i>f. Being well-connected with easy access to public transport and active travel.</i> <i>g. Providing enhanced permeability for walking and cycling.</i>
Objective 2.13	<i>Cork City Neighbourhood Profile The Cork City Neighbourhood Profile (2021), and subsequent updates, provide an understanding of the nature and context of an existing neighbourhood, town or community and shall be used as an evidence base to inform good planning and responsive design for new developments within the existing and emerging network of neighbourhoods and communities within the city.</i>
Objective 2.14	<i>Neighbourhood Mix Promote high quality neighbourhoods by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities.</i>
Objective 2.15	<i>Neighbourhood Design The design and siting of development shall create a sense of community and identity, enhance connectivity, incorporate creative approaches to urban design, enhance landscape character and green and blue infrastructure and respect the local context and character of the area.</i>
Objective 2.17	<i>Strategic Regeneration Support and enable the development and renewal of strategic regeneration sites in Cork Docklands, Cork City Centre and areas throughout the city as key deliverables to achieve NPF growth targets.</i>
Objective 2.18	<i>Underutilised Sites</i>

	<i>Cork City Council will seek to address issues of dereliction, vacancy and underutilisation of sites within Cork City by encouraging and facilitating their re-use and regeneration subject to good planning and the infrastructural carrying capacities of the area.</i>
Objective 2.22	<i>Population Growth In planning for future population growth, Cork City Council will assess important factors such as changing average household size, tenure, type and mix (including student accommodation) and existing occupancy and vacancy rates within an area. These factors will help inform policy making, development management guidance and decisions for new development proposals in the city.</i>
Objective 2.23	<i>Quality of Life In planning for future population growth, Cork City Council will assess and monitor quality of life factors including improvements in the urban environment, community infrastructure and cultural experiences that can increase the numbers of people seeking to live, work, study, visit and experience the city.</i>
Objective 2.24	<i>Implementing the Core Strategy To implement and support the delivery of the Core Strategy in accordance with the Core Strategy Map and Table, the Growth Strategy Map and Table and the Objectives for City Growth Table set out in this plan.</i>
Objective 2.25	<i>Compact Growth It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.</i>
Objective 2.26	<i>Housing Supply Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built.</i>
Objective 2.35	<i>Monitoring Regeneration To support active land management and development by continuously monitoring the level of development in brownfield, infill and greenfield sites, with an aim to support the targets and objectives of the Cork City Development Plan the Cork MASP and the NPF.</i>
Objective 3.1	<i>Planning for Sustainable Neighbourhoods Cork City Council will seek to:</i> <ul style="list-style-type: none"> <i>a. Utilise the Urban Towns, Hinterland Villages and City Neighbourhoods as spatial units to develop sustainable neighbourhoods, employing the 15-Minute City concept;</i> <i>b. Require development proposals to put placemaking at the heart of their design concept and clearly demonstrate how neighbourhood integration and enhancement is central to this;</i> <i>c. Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide', and any updates.</i> <i>d. Ensure that an appropriate level of supporting neighbourhood infrastructure is provided in conjunction with, and as an integral component of, residential development in New Sustainable Neighbourhoods.</i> <p><i>[and]</i></p> <ul style="list-style-type: none"> <i>f. Create healthy and attractive places to live consistent with NPO 4 of the NPF and Goal 3 Sustainable Place Framework of the RSES.</i>
Objective 3.2	<i>A Diverse, Inclusive and Equal City Cork City Council will seek to ensure that ensure that Cork is an inclusive City and meets the needs of the City through by:</i> <ul style="list-style-type: none"> <i>b. Consciously considering specific people groups in the design of neighbourhoods, places, buildings, streets and spaces to meet the needs of all citizens;</i> <i>c. Consciously considering specific people groups in the development of planning policy, strategies and frameworks.</i>

	<p><i>d. Promoting measures that reduce concentrations of social inequality between neighbourhoods.</i></p>
Objective 3.3	<p><i>New Housing Supply</i> <i>Provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period. This will be achieved by:</i> <i>[amongst others]</i> <i>e. Optimising the potential of brownfield sites (see Objective 3.4);</i> <i>[and]</i> <i>g. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods and are designed to the highest standards (see Chapter 11: Placemaking and Managing Development).</i></p>
Objective 3.4	<p><i>Compact Growth</i> <i>Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork.</i> <i>Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by:</i> <i>[amongst others]</i> <i>b. Progress housing and employment delivery in urban centres and strategic regeneration sites;</i> <i>f. The utilisation of planning and urban design tools to provide a framework for the development of sites (e.g. masterplanning, framework plans, neighbourhood strategies, historic area regeneration strategies, site specific briefs);</i> <i>g. Optimising the use of land (see PO HSC3: Density of development, below);</i> <i>j. Combining its role as planning authority and housing authority to bring about residential development to meet demand and need;</i> <i>k. Where new sustainable transport infrastructure is planned land use designations will be reviewed and updated, where appropriate to provide for housing or mixed use development (including housing);</i> <i>l. Unlock the development potential of brownfield sites to be used as an evidence base and business case for intervention; and</i> <i>m. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods.</i> <i>n. Identify and promote the development potential of brownfield, small sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets.</i></p>
Objective 3.5	<p><i>Residential Density</i> <i>Cork City Council will seek to:</i> <i>a. Promote compact urban growth by encouraging higher densities throughout Cork City according to the Cork City Density Strategy, Building Height and Tall Building Study and resultant standards set out in Chapter 11: Placemaking and Managing Development and Mapped Objectives; and</i> <i>b. Ensure that urban density is achieved by development proposals providing for high quality sustainable residential development, ensure a balance between the protection of the established character of the surrounding area and existing residential amenities;</i> <i>c. Ensure that urban density is closely linked to creating successful neighbourhoods (see 3-A-1, above) and ensuring that neighbourhoods are integrated and permeable to ensure short trips are possible to urban centres, local services and amenities;</i> <i>d. Ensuring high-quality architectural, urban and public realm design. Guidance is set out in Chapter 11: Placemaking and Managing Development.</i></p>
Objective 3.6	<p><i>Housing Mix</i> <i>Aimed at implementing the provisions of the Joint Housing Strategy and HNDA.</i></p>

	<p>Part e. is as follows:</p> <p><i>Encourage the provision of housing for one and two person households in all neighbourhoods to meet the needs of all age groups, including providing for downsizing to release family housing units.</i></p>
Objective 3.7	<p><i>Build-to-Rent and Shared Accommodation</i></p> <p>a. <i>Cork City Council will facilitate the provision of Build-to-Rent in suitable locations in Cork City and schemes shall comply with the requirements of the “Sustainable Urban Housing: Design Standards for New Apartments” Guidelines (DHPLG, March 2018) and the December 2020 update, and any subsequent updates. At the neighbourhood level development proposals should contribute to the creation or maintenance of a socially balanced and inclusive neighbourhood. Development proposals will need to be justified within the context of the HNDAs demand forecasts for one and two—person households and the spectrum of dwelling types and tenures available for that population group.</i></p>
Objective 3.10	<p><i>Housing and Community for Older People (Age Friendly Housing)</i></p> <p><i>Cork City Council will actively seek to meet the housing and community needs of older persons by:</i> [amongst others]</p> <p>a. <i>Supporting mainstream housing options for older people and persons with disabilities (including but not limited to physical, mental health) consistent with NPO 30 of the NPF, and RPO 182 of the RSES.</i></p> <p>c. <i>Promoting opportunities for right sizing / downsizing by older people within their neighbourhoods to enable sustainable social networks and support to be maintained.</i></p> <p>d. <i>Supporting the provision of integrated housing and community development specifically designed for older people in accessible locations that allow for wider engagement with existing communities.</i></p> <p>f. <i>Supporting the development of lifetime housing (Lifetime Homes Standard).</i></p> <p>g. <i>Supporting the development of housing designed to Universal Design Standards.</i></p>
Objective 3.14	<p><i>Community Infrastructure and Services</i></p> <p><i>To work with our communities and infrastructure providers in facilitating the development and provision of a range of accessible, socially inclusive, multi-functional and diverse community facilities throughout the City.</i></p>
Objective 3.17	<p><i>Community Hubs</i></p> <p><i>To promote the co-location and sharing of community, enterprise, recreation and open space infrastructure to create community hubs of scale at locations that can be accessed by walking, cycling and public transport and subject to there being no significant adverse impacts on local amenity.</i></p>
Objective 3.20	<p><i>Cork City as a Child-Friendly City</i></p> <p><i>To promote Cork as a child-friendly city by considering the needs of children in terms of appropriate design when changes are proposed to the built environment.</i></p>
Objective 3.21	<p><i>Childcare Facilities</i></p> <p><i>To support the provision and expansion of high quality childcare facilities throughout the city. The Council will:</i></p> <p>a. <i>Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered.</i></p> <p>b. <i>Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed.</i></p>
Objective 3.28	<p><i>Neighbourhood Recreation and Amenity</i> [amongst others]</p> <p>b. <i>To support and facilitate the development of outdoor and indoor recreational facilities to cater for all age-groups on suitable sites.</i></p>

	<p>e. To support the provision of formal and informal play areas with appropriate equipment and where possible, incorporating nature-based play equipment and layouts. These, where practical, should seek to appeal to a range of age cohorts through their layout and equipment.</p>
Objective 3.30	<p><i>Social Inclusion</i></p> <p>a. To support policies, strategies and plans that address social inclusion.</p> <p>[and]</p> <p>c. To support economic development, urban regeneration, lifelong learning and the development of community facilities in more socially and economically disadvantaged parts of the City.</p>
Objective 3.31	<p><i>Inclusive Design</i></p> <p>To promote and where applicable implement inclusive design in all new development and in works to existing buildings and facilities including open space and public realm areas to optimise the facilities for all age groups and abilities. This includes embracing the National Disability Authority's Universal Design Guidelines, age friendly principles and international best practice.</p>
Objective 3.34	<p><i>Safe and Secure City</i></p> <p>a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas.</p> <p>b. To encourage buildings and spaces to be designed with safety and security in mind to avoid anti-social behaviour, reduce and prevent crime and create safe places for all.</p> <p>c. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.</p>
Objective 4.1	<p><i>CMATS</i></p> <p>Cork City Council will work in cooperation with the NTA, TII and Cork County Council to fully implement the Cork Metropolitan Area Transport Strategy subject to detailed engineering design and environmental considerations, including the projects and programmes in relation to walking, cycling, public transport, BusConnects, suburban rail, light rail, park and rides and roads infrastructure.</p>
Objective 4.3	<p><i>Strategic Location of New Development</i></p> <p>To ensure that all new residential, employment and commercial development are focused in areas with good access to the planned high frequency public transport network.</p>
Objective 4.4	<p><i>Active Travel</i></p> <p>To actively promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient, and safe cycle routes and footpaths across the city.</p> <p>To support the expansion of the Cork Bikes scheme.</p> <p>To accommodate other innovations such as electronic bikes, public car hire, and other solutions that will encourage active travel.</p> <p>To support the rollout of the NTA 5 Year Cycle Plan.</p> <p>To support and engage with the Safe Routes to School programme.</p>
Objective 4.5	<p><i>Permeability</i></p> <p>a. All new development, particularly alongside the possible routes identified for public transport improvements, shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility.</p> <p>b. To maximise permeability, safety, security and connectivity for pedestrians and cyclists by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed.</p>
Objective 5.1	<p><i>A Climate Resilient City</i></p> <p>To create a more climate resilient, low carbon and environmentally sustainable City where our stakeholders and communities participate in, and benefit from integrated climate and environment action measures which also offer other social, economic and biodiversity benefits.</p>
Objective 5.2	<p><i>International and National Climate Change Legislation, Policy and Guidance</i></p>

	<i>To support and where possible surpass the implementation of international policy and national legislation, policy, sectoral adaptation strategies and guidance on climate change in Cork City including the commitment within the Climate Action and Low Carbon Development (Amendment) Bill 2021 to secure a 51% reduction in carbon emissions by 2030 and to net zero by 2050.</i>
Objective 5.10	<i>Energy Conservation and Efficiency To support and help create high levels of energy conservation and energy efficiency in both new and existing buildings.</i>
Objective 5.11	<i>Energy Efficiency Considerations New development proposals are expected to maximise energy efficiency through location, siting, orientation, layout, design, stormwater drainage and landscaping. This includes seeking to optimise energy efficiency through thermal insulation, passive ventilation and cooling and passive solar design.</i>
Objective 5.12	<i>Energy Use Management Development proposals are encouraged to incorporate best practice in technologies that help reduce energy use or enables the monitoring and management of energy use.</i>
Objective 5.13	<i>Waste Management – Construction and Operation of Development All development proposals should minimise waste and maximise the recycling and re-use opportunities during the construction and operation phases.</i>
Objective 5.14	<i>Adaptable Design To encourage the incorporation of adaptable design into all new all developments to facilitate their adaptation to alternative use, layout or user requirements in the future if required.</i>
Objective 5.15	<i>Lifetime Adaptable Housing To promote and assist in the provision of lifetime adaptable homes to meet the needs of all society.</i>
Objective 5.16	<i>Renewable and Low Carbon Energy To encourage development proposals to consider use of renewable energy infrastructure from the project inception stage with planning applications for larger development schemes required to demonstrate how renewable energy infrastructure have been considered through Scheme Sustainability Statements (See Scheme Sustainability Statements in Chapter 11 Placemaking and Managing Development).</i>
Objective 5.17	<i>Heat Pumps To support the use of heat pumps in new build residential, commercial and public buildings taking into account amenity, conservation and heritage considerations.</i>
Objective 5.18	<i>Roof-Top Solar Photovoltaic/Thermal Panels To support the incorporation of photovoltaic and/or solar thermal collector panels for electricity generation/storage and water heating on new residential, commercial and public buildings taking into account amenity, glint and glare, conservation and heritage considerations.</i>
Objective 5.22	<i>Electric Vehicles To encourage and support the use of Electric Vehicles (EV) and Light Electric Vehicles (LEV) and support the provision of charging infrastructure for EVs on-street, within carparks and in new developments.</i>
Objective 5.24	<i>Green and Blue Infrastructure</i> <ul style="list-style-type: none"> <i>a. To support the strategic role that Green and Blue Infrastructure plays in facilitating a more climate resilient city.</i> <i>b. All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme.</i>
Objective 6.5	<i>Trees & Urban Woodland</i> <p>[amongst others]</p> <ul style="list-style-type: none"> <i>b. To encourage the planting of new urban woodlands and trees where appropriate throughout the City and particularly where there are deficiencies in tree coverage as identified in the Cork City Green and Blue Infrastructure Study.</i>

	<p>d. To support retaining existing trees and the planting of new trees as part of new developments subject to care on the species of tree and the siting and management of the trees to avoid conflict with transport safety and residential amenity in particular.</p> <p>e. To promote the planting of pollinator friendly native deciduous trees and mixed forestry to benefit biodiversity.</p>
Objective 6.11	<p><i>Landscape and Development</i></p> <p>To ensure that the management of development throughout Cork City will have regard for the value of the landscape, its character, distinctiveness and sensitivity in order to minimize the visual and environmental impact of development, particularly in designated areas of high landscape value where higher development standards (layout, design, landscaping, materials) are required.</p>
Objective 6.18	<p><i>Public Open Space</i></p> <p>a. To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned Public Open Space for alternative purposes.</p> <p>c. The development of open spaces should “aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community.</p> <p>d. To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities.</p> <p>e. Specific design outcomes should be framed in relation to the nature of spaces being created or enhanced (e.g. in relation to maintenance, nature exposure and connectivity, strategic landscape and social role).</p> <p>f. Support measures to green the city, including re-grassing of appropriate hard-surfaced areas in locations throughout the City.</p>
Objective 6.20	<p><i>Active Recreational Infrastructure</i></p> <p>a. To ensure that all residents have access to neighbourhood scale outdoor and indoor active sports recreational infrastructure within their neighbourhood or in accessible locations.</p> <p>[and]</p> <p>f. To require new residential developments over 10 units and other major developments to meet those active recreation needs generated by the development with the provision of appropriate active recreation infrastructure.</p>
Objective 6.22	<p><i>Natural Heritage and Biodiversity</i></p> <p>[amongst others]</p> <p>b. To support the implementation of the National Biodiversity Plan and the All-Ireland Pollinator Plan and successor publications in Cork City.</p>
Objective 6.26	<p><i>Alien Invasive Species</i></p> <p>To support the implementation of measures to control and prevent the introduction, establishment or spread of ecologically damaging alien invasive species (e.g. Japanese Knotweed and Himalayan Balsam).</p>
Objective 7.8	<p><i>Mobility Management Plans</i></p> <p>In addition to traffic impact assessments, Cork City Council will encourage all planning applications for new employment uses, or extensions to existing commercial premises, for 100 or more employees to prepare mobility management plans which promote and prioritise the use of more sustainable transport modes.</p>
Objective 7.31	<p><i>Small Local Shops</i></p> <p>To support, promote and protect small local shops including corner shops which provide an important retail service at a local level. Any proposed new local shops should serve a local need only and be of a size and scale which would not be detrimental to the health of nearby centres defined within the retail hierarchy and subject to the protection of residential amenity.</p>
Objective 9.2	<p><i>Waste Water</i></p>

	<ul style="list-style-type: none"> a. To require all new proposals for development to provide a separate foul and surface water drainage system and to incorporate Sustainable Urban Drainage Systems in so far as practical. b. As part of new proposals for development, evidence of consultation with Irish Water should be submitted as part of a planning application, demonstrating that adequate water services are available to service the development and that existing water services will not be negatively impacted.
Objective 9.4	<p><i>Sustainable Urban Drainage Systems (SUDS)</i></p> <ul style="list-style-type: none"> a. To require that all planning applications for new development incorporate Sustainable Urban Drainage Systems (SUDS) in so far as possible. Such proposals shall be accompanied by a comprehensive SUDS assessment including run-off quantity, run off quality and impacts on habitat and water quality.
Objective 9.5	<p><i>Discharging</i></p> <ul style="list-style-type: none"> a. To ensure that onsite petrol/oil interceptors and silt traps shall be installed to all significant road projects/upgrades or for proposals where surface water otherwise discharges to watercourses, to prevent hydrocarbon pollution of the receiving waters. b. To ensure that developments permitted by the Council which involve discharge of wastewater to surface waters or groundwaters, comply with the requirements of the EU Environmental Objectives (Surface Waters) Regulations and EU Environmental Objectives (Groundwater) Regulations.
Objective 9.6	<p><i>Storm Water</i></p> <p>To provide adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.</p>
Objective 9.11	<p><i>Waste Management</i></p> <ul style="list-style-type: none"> a. To support the sustainable management of waste in line with the objectives of the Southern Region Waste Management Plan 2015-2021 and its successor.
Objective 9.14	<p><i>Renewable Energy</i></p> <p>To promote the increased use of renewable energy resources in Cork City such as solar, wind, geothermal, heat pumps and district heating.</p>
Objective 9.18	<p><i>External Lighting</i></p> <p>To require that external lighting proposals minimise the harmful effects of light pollution, are energy efficient, and do not have an excessive impact on residential or visual amenity, biodiversity or result in the distraction of road users.</p>
Objective 11.1	<p><i>Sustainable Residential Development</i></p> <p>Residential developments shall be sustainable and create high quality places which:</p> <ul style="list-style-type: none"> a. Contribute to placemaking and to the 15-minute city and walkable neighbourhood concepts. b. Prioritise walking, cycling and public transport, and minimise the need to use cars. c. Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience. d. Provide a good range of community and support facilities, where and when they are needed and that are easily accessible. e. Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained. f. Are easy to access for all and to find one's way around. g. Promote the efficient use of land and of energy, and minimise greenhouse gas emissions. h. Provide a mix of land uses to minimise transport demand. i. Promote social integration and provide accommodation for a diverse range of household types and age groups. j. Enhance and protect green and blue infrastructure and biodiversity.

Objective 11.2	<p><i>Dwelling Size Mix</i></p> <p><i>All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances.</i></p> <p><i>Applications for 10-50 dwellings will need to provide a dwelling size mix that benefits from the flexibility provided by the dwelling size target ranges provided for the respective sub-area.</i></p> <p><i>Purpose-Built Student Accommodation schemes will be exempt from dwelling size mix targets. Where there is a target for student accommodation, and it can be demonstrated that this demand has been provided for within the area, then this demand can be reassigned to other dwelling sizes according to the relative target proportions.</i></p> <p><i>Where a clear justification can be provided on the basis of market evidence that demand / need for a specific dwelling size is lower than the target then flexibility will be provided according to the ranges specified.</i></p>
Objective 11.3	<p><i>Housing Quality and Standards</i></p> <ol style="list-style-type: none"> <i>a. High quality functional design: Housing developments should be of a high quality design and provide adequately sized rooms with comfortable and functional layouts, which are fit for purpose without differentiating between tenures.</i> <i>b. Housing quality: Qualitative aspects of development are key to ensuring successful sustainable housing. Table 11.10 sets out key qualitative aspects that should be addressed in the design of housing developments.</i> <i>c. Dual aspect dwellings: Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered to be a more appropriate design solution than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.</i> <i>d. Daylight Sunlight and Overshadowing: The design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst, minimising overshadowing and maximising the useability of outdoor amenity space.</i> <i>e. Waste: Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables, food waste and residual waste.</i> <i>f. Minimum spatial standards: Housing developments are required to meet the minimum standards defined below.</i>
Objective 11.4	<p><i>Daylight Sunlight and Overshadowing (DSO)</i></p> <p><i>All habitable rooms within new residential units shall have access to appropriate levels of natural/ daylight and ventilation. Planning applications should be supported by a daylight and sunlight design strategy that sets out design objectives for the scheme itself and its context that should be included in the Design Statement.</i></p> <p><i>The potential impacts of the proposed development on the amenities enjoyed by adjoining properties will need to be assessed in relation to all major schemes and where separation distances are reduced below those stipulated. Cumulative impacts of committed schemes will also need to be assessed.</i></p> <p><i>Daylight, Sunlight and Overshadowing (DSO) assessment, utilising best practice tools, should be scoped and agreed with the Planning Authority prior to application and should take into account the amenities of the proposed development, its relevant context, planning commitments, and in major development areas the likely impact on adjacent sites.</i></p>

Table 20. Key Objectives of the Draft Cork City Development Plan 2022-2028 relevant to the proposed development.

The proposed development aligns with the above Draft Development Plan Objectives in the following ways:

- **Will comply with the Z0 2 New Residential Neighbourhoods zoning objective for the site.**

- Will contribute towards achieving NPF population growth targets and the objective of compact growth.
- Will deliver much needed new homes in Cork City, that will strengthen, expand and diversify the existing community in the area.
- Will support a high degree of sustainable transport use.
- Will support national and local climate action objectives regarding renewable energy generation, passive solar heating and a high standard of build quality including insulation.
- Will provide excellent open space with active recreational infrastructure for all age groups, while at the same time enhancing biodiversity on site through the use of SUDS and through the planting of new native and high value non-native trees and other plant species in line with the All-Ireland Pollinator Plan. An Invasive Species Management Plan has also been prepared in respect of the proposed development by DixonBrosnan and is included in Appendix B of the Construction Environmental Management Plan prepared by Arup, copies of which accompany the planning application.
- Will exhibit an example of best-in-class placemaking, with high-quality urban design and the inclusion of a landmark tall building.
- Will support the objectives of the Cork MASP.
- Aligns with the objectives of CMATS, particularly in terms of BusConnects and walking and cycling routes and infrastructure.
- Will support the realisation of a 15-minute neighbourhood in the Kinsale Road/Tramore Road area that is walkable and permeable, with a high degree of passive surveillance designed into the scheme.
- Will provide a mix of uses, facilities and amenities which will complement the residential use proposed.
- Through its design, will ensure a high quality of life for those living on site and nearby.
- Will provide a good choice of dwelling types and sizes. This, combined with the high-quality urban design will support a sense of inclusive, diverse community forming on site.
- Has the potential to instigate the wider regeneration of the Kinsale Road/Tramore Road area.
- Will bring back into use a large, underutilised, brownfield site.
- Provides for EV parking and will facilitate a high degree of cycling.

- **Is supported by a Daylight and Sunlight and Overshadowing assessment which demonstrates that the proposed development will ensure high levels of access to daylight and sunlight for future residents, without excessively overshadowing neighbouring properties.**

Section 7.3 below addresses matters where the proposed development could be considered not to align with the Objectives of both the current and draft development plans, which are addressed in detail in the accompanying Statement of Material Contravention prepared by Coakley O'Neill Town Planning Ltd.

7.3 Summary

Existing and permitted heights in Cork City include 34 storeys (Custom House Quay), 25 storeys (Jacob's Island), 24 storeys (Albert Quay), 17 storeys (Elysian; Railway Gardens), 15 storeys (Prism), 14 storeys (the Former Ford Distribution Site), and several developments comprising 10 storeys.

Permitted densities in Cork City include 530 units/ha (Albert Quay), 495 units/ha (Horgan's Quay), 454 units/ha (Railway Gardens), 247 units/ha (The Former Ford Distribution Site), 238 units/ha (Victoria Road), 220 units/ha (Crow's Nest), 183 units/ha (Lower Friar's Walk), and 137 units/ha (Jacob's Island).

Furthermore, the pattern of permitted dwelling mixes in high-density residential developments in Cork City demonstrates that the indicative dwelling mix targets contained in Table 16.4 of the Cork City Development Plan 2015-2021 are very much indicative only.

A Statement of Material Contravention has been prepared by Coakley O'Neill Town Planning in respect of the proposed development and is included as part of this planning application.

The key arguments of that statement are:

- the proposed development is of strategic importance, as it will contribute to an increased supply of residential accommodation in the context of a chronic housing shortage and thus support national and regional policy objectives to deliver more homes within the existing footprint of cities and in cities other than Dublin to achieve regional parity in the country.
- there are conflicting objectives or objectives not clearly stated in the Development Plan, insofar as they apply to the preferred locations for tall buildings in Cork.
- permission for the proposed development should be granted having regard to the RSES for the Southern Region (which includes the Cork MASP), guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, and
- permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan, including recent decisions of An Bord Pleanála.

In this context, it is our submission that the Board can grant planning permission for the proposed development in accordance with Section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended), and Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

8.0 Conclusion

In conclusion, having regard to:

- the provisions of the National Planning Framework, which support the escalation of population growth in the existing built-up area of Cork City,
- the provisions of the Urban Development and Building Height Guidelines 2018, that advocate a presumption in favour of tall buildings in cities, subject to assessment against specific performance criteria,
- the provisions of the Regional Spatial and Economic Strategy for the Southern Region, which recognises the need to densify Cork City,
- the Design Manual for Urban Roads and Streets (2019),
- the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, and the accompanying Urban Design Manual – A Best Practice Guide (2009),
- the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020),
- the site's strategic position in a prominent gateway location along a key approach to the city,
- the site's proximity to public transport,
- the significant potential of the proposed development, owing to its scale and nature, to initiate regeneration of the wider Tramore Road/Kinsale Road area,
- the nature, scale and design of the proposed development, and
- the pattern of existing and permitted development in the area,

it is considered that the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect and enhance the existing character of the area and would be acceptable in terms of pedestrian and traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area

Appendix A: Cork City Council Minutes of Section 247 Pre-Application Consultation held on 21/04/2021

	<p>Cork City Council Culture, Community and Placemaking Directorate Pre-Planning Record of Advice Ref: 77/21</p>
---	--

Section 247 (2) of the Planning & Development Act 2000 (as amended) states *“the planning authority shall advise the person concerned of the (1) procedures involved in considering a planning application including any requirements of the permission regulations, and shall, as far as possible, indicate (2) the relevant objectives of the development plan which may have a bearing on the decision of the planning authority.”*

1. Site Location/Site Address	Former CMP Dairy Site, Tramore Road (Creamfields)
2. Person Requesting Meeting	Aiden O’Neill
3. Applicant	Watfore Ltd
4. Person’s Interest in Land/Letter of Consent	Applicant is the owner
DOCUMENTATION SUBMITTED	
Yes	Preplanning presentation report and pre-planning drawings prepared by Reddy Architecture and Urbanism, Landscape Masterplan and Landscape Design Rationale prepared by CSR Land Planning and Design, Planning Report and Statement of Consistency prepared by Coakley O’Neill Town Planning Ltd, Traffic and Transport Assessment Scoping, Environmental Screening and Scoping Report, Site Infrastructure Report and Daylight and Sunlight Preliminary Report prepared by Arup consulting engineers, Energy Statement, M&E Basis of Design, Outdoor lighting report and Drawings prepared by EDC and Planning Support Report prepared by Savills.
BRIEF DESCRIPTION OF DEVELOPMENT/PROPOSAL	
<p>Watfore Limited intend to apply to An Bord Pleanála for planning permission for a strategic housing development at the former CMP Dairies site, Kinsale Road and Tramore Road, Cork. The proposed development will consist of:</p> <p>a) The construction of 753 no. apartments (comprising a mix of 1 (293), 2 (387) and 3 (73) bed apartments) in 7 no. Blocks, ranging in height from 4-15 storeys</p> <p>b) Of the 753no. apartments, 238no. (70 no. 1 bed; 133no. 2 bed and 35no. 3 bed) are proposed as Build To Rent, and these are located in Blocks E and F</p> <p>c) Blocks E and F also include commercial and community facilities, including the provision of 1no. gym, 1no. café, 1no. retail unit, 1no. creche, 1no. multi-functional community space incorporating a lounge/events space, cinema/media room, co-working lounge/business centre, and coffee dock. There is also a community room on the ground floor of Block C.</p> <p>d) The provision of internal and external amenities for residents and open space/landscaping areas to include a town square; garden courts; a meadow park; a linear park along Kinsale Road, and roof terraces.</p> <p>e) 215no. ancillary car parking spaces (149no. basement spaces and 66no. surface spaces) and 1,290 cycle spaces;</p> <p>f) The provision of 1 no. new primary access off Kinsale Road, modifications to the exiting access off Tramore Road, and internal link road through the site, as well as shared surfaces, pedestrian walkways and cycle paths throughout the site, and</p> <p>g) All associated ancillary development works, including storage; plant, including ESB substations; and waste management facilities.</p>	

APPLICANT MUST READ COMMENTS BELOW IN CONJUNCTION WITH & REFER TO [CORK CITY DEVELOPMENT PLAN](#):
WWW.CORKCITYDEVPLAN.COM OR VIEW HARD COPY AT CORK CITY COUNCIL

Note of meeting -Former CMP Site (Creamfields)

21.04.2021@10.30am

Hosted on Microsoft Teams

Introductions

Gwen Jordan (GJ) gave introductions and synopsis.

Aiden O'Neill (AON) – gave introductions.

Applicants team took turns to update the Council on their work to date.

Sean Kearn (SK) took the attendees through the Reddy scheme document. Main points raised:

- Strategic important brownfield site, new heart for community. Creation of a town square development which is easily accessible to large area of city. On a bus route between city centre and airport.
- A new destination as well being on a proposed rapid public transport corridor. Not just residential proposed here but, provision of a Primary Care Centre (PCC), pharmacy, retail, café etc. This is not just for residents but wider area.
- Catalyst development offering opportunity to create a new city precinct.
- Concept of a sustainable compact city, excellent opportunity for this here. Concept of 15 min neighbourhood/city. Cork city perfect for this dev opportunity.
- Create connection to Tramore valley park and restoration of Tramore river itself. Opportunity to reconsider the entire area for streets and parkland. Starting point for new vision for this part of city.
- Kinsale Road as an arterial boulevard.
- Pedestrian and cycle link to city and airport. Create urbanity to the area on either side of this boulevard. Potential for future of development on other side of the road.
- 15 minute city concept at core.

Have had previous meetings with city council. A number of changes since September 2020:

- Proposal reduced from 807 to 753. Have now include the bus connect corridor and pedestrian and cycle infrastructure.
- Development now proposed with limited parking but connected to active modes of public transport infrastructure
- Emphasis on creating character areas and hierarchy.
- Introduction of a variety of heights in the scheme including a landmark building
- Kinsale road building are now staggered for variety
- Mainly brick clad, and plaster only used internally

Variation of development plan and densities of proposal on this site:

Variation changing land use zoning from light industrial to residential. Discussion of 400 units on site. PCC building and surface parking occupied a larger part of the site in that variation.

The proposal densifies the PCC and removes the surface parking. Now consistent with variation proposal as envisaged and not far off in terms of density and heights. Strong urban design arguments for what they are doing compared to the variation proposal.

Site masterplan concept informed by:

- Taking the perimeter buildings to utilise the natural topography. Primary site entrance is opposite the Mick Barry junction.
- This will be a permeable site. A strong urban edge to Kinsale an Tramore road. Bocks orientate to maximise light penetration.
- Character areas, trees etc.
- CMATS
- Landscaped edge to accommodate pedestrian and cycle route and bus corridors
- Pedestrian route through the scheme. Attractive landscaped environments to walk through.
- One vehicle entrance through Mick Barry junction
- Park and ride beside the site. Underutilised, development will bring this into full use

Aiden O Neill

- Planning – significant body of policy support for the proposals.
- Vacant serviced brownfield site with local, regional and national and internal connectivity
- Walking distance to services within 15 mins- compact city
- Opportunity for an inner suburban neighbourhood. Distinctive, sustainable, and compact
- Underutilised park and ride facility nearby, availability of high frequency public transport and cycle routes. Comparable to Kent station sites.
- Encourage investment in bus connects along Kinsale Road.
- Responds directly to variation no. 6 of the CDP 2015-2021, which rezoned site to residential from light industrial.
- Will help delivery policy objectives of the NPF and RSES for cork. Additional population as well as regeneration opportunity to intensify housing development in inner suburban areas.
- OPR in submission to variation agreed opportunity for more intensive development including residential.
- Height and density rationale. Climate change agenda is driving compact urban growth. Existing high quality public transport serving site.
- Site is unconstrained in terms of sensitive receptors. Single ownership. Aligned with contemporary emerging urban character of Cork.
- Paragraphs 16.37 and 16.41 of CDP supports tall building and residential where public transport supports the site.

Simon Van Jaarsveld (SVJ) ARUP commented on Traffic and Transport

- Site is not currently responding to existing cycle routes on Kinsale road.
- Linear park to accommodate pedestrian and cycle lanes
- Junctions are wide, want to make them more compact to easier to cross on foot for people leaving the site.
- Want to encourage active more and public transport. Support CMATS.
- Will develop a traffic plan framework for the development.
- Parking will be limited, encourage other modes.

Stephen Ginn commented on Drainage

- Surface Water Strategy - have reviewed with Simon Lyons on discharge rate and runoff, to south of the site this will be into existing sewer, or else new outfall to the Tramore river.
- Foul strategy - northern half of site will discharge to diverted combined sewer. Southern half will be pumped from station at central court up to combined sewer. Have liaised with IW already. Will continue these talks.

Daniel Garvey ARUP

- EIA and AA. Initial work has commenced.

Stephen Ginn commented on Daylight and overshadowing, and wind assessment.

- Buildings will be well spaced out, aim to get light to these courtyard areas. Some rooms have been identified a needing further development.
- Wind modelling assessment has been undertaken. High quality development, good shielding got pedestrians.

GJ thanked the applicant team for their presentations. Highlighted that the purpose of meeting was for CCC as the consulting authority (not permitting authority) to guide applicant on key issues that would arise, and to give a steer if this was lodged at opinion stage as a SHD. CCC have met internally. Key issues arising are outlined as follows:

- From outset it is acknowledged that the site is in south central area, will be subject to a lot of change in coming years both residential and mixed use. CCC do see higher densities coming in, compared to adjoining residential areas.
- This site presents a unique opportunity for a redefining the area. Opportunity for placemaking. Predominately residential in proposal. The area is transitional, between retail warehousing, light industrial to south and early 20th Century housing to north. Much benefit in terms of it not having constraints of a city centre site.
- We welcome the proposal and are mindful of issues meetings in previous meeting relating to density, massing, scale and layout.
- Initial question raised why is the PCC not included in application? Noted concerns about that. We understand there is a phasing, but rational for leaving it out?
- AON responded that SHD limits commercial element to 4500sqm. If PCC included in addition to other amenities they would be well over the limit and would not qualify for SHD. It will be submitted concurrently. Niall Sheehan confirmed that they will be lodging the application for the PCC at same time as physical application stage. Commitment is there to deliver PCC

CCC then provided feedback on layout, density, tenure, height, access, viability, other engineering matters. The applicant's response where given is also noted.

Layout and typology

- GJ set out that the layout is quite similar to what we saw before. Repetitive block layout. Appreciate justification but it is really limiting the typology offered by the scheme with 7 blocks of all apartments. CCC are surprised at lack of mix of house typologies on site. CCC see this an opportunity for a diverse mix within a site of this size. Density is limiting potential for a more diverse layout within the scheme.

- There is a fairly clear distinction at the north section of the site. The location of the PCC and a taller element of the scheme are appropriate .. Concerns with precedent, heights are not diverse enough for the length of the site.
- Character areas are not particularly distinctive along Kinsale Rd elevation. Appreciate the efforts of design team, but there are no visual cues from outside the scheme that there are distinctive character areas within. if the massing was broken up by houses, duplexes etc then you could better achieve the character areas.
- Tony Duggan advised the creation of streets and boulevard is good concept. Need to see how greater area will accept this. Needs to have a transition area, between warehousing and Ballyphehane. A more diverse housing type on this side. Accordia in Cambridge is a good example.

- Tony Reddy -fully accept point about typologies. Layout has evolved since earlier scheme. They have now introduced streets and squares, link site to other areas. Has evolved quite a bit.
- AON responded that the scheme now geared towards family units, with many being well in excess of the space standards. A hybrid scheme of either owner occupied or rental. This responds to a range of housing needs. This will be a permanent housing location. 51 percent of units are 2 to 3 bed.
- AON advised need to look at higher density here due to the site's attributes. Dynamism of area, flagship for regeneration opportunities. It would be remiss not to. Unconstrained sites like in the city this is rare.

- GJ set out CCC are mindful that it is located in an area adjoining an established residential area. Not averse to a number of apartment blocks, but disappointed that there aren't more typologies. This would allow to break down blocks, allow more own front door access, allow opportunity people to interact for Long term community building and neighbourhood building.
- The public plaza to north is legible and appropriate. As one moves further down the site, how would public know that they are moving into a secure supervised residential area. Understand the ethos to keep something open, but with capacity of almost 2000 people how would these communal areas be supervised especially for families and children play spaces.

- Sean Kearns explained that there will be overlooking of these communal areas within the scheme. Do not want to create a gated environment. Clues for public would be in the design.
- The site will be stepped down from public space to residential courtyard. Scheme contains 61% oversized units. Need to build more like this to achieve the NPF targets. Not many sites like this. There is an idea that apartments aren't for families, but we should be moving towards European way of living. Huge drop off if you introduced houses and duplex due to requirement to provide gardens. Site is surrounded by big open spaces. To deliver the transport improvements you need the densities. For Cork to grow and accommodate the population we need to build to these levels.

- AON added the main desire line for public will be along the Kinsale road side within the proposed linear park.
- GJ advised that it is felt that they are missing the opportunity to provide a mix here. It is adjoining an established residential area. People might want to move out from those houses to this scheme. Mixed appeal provided by a mixed offer of house types for this site.
- Tony Reddy – the Client want to work with CCC and they might be able to look at units with own door access or duplex with own door access. They will not be houses.

Density

- GJ went on to discuss density. This needs to be bedded down with evidence-based criteria. Have discussed this with policy. Advised that the applicant is not bound by this figure but the draft Development Plan coming out in a few weeks sets out that there are different density locations. This site as proposed would be denser than the docklands.
- Need to consider the context of the site. The general area is considered an inner urban residential location. Expected yields 40-100 units per hectare. This site contributes to our housing targets, but at 2.49 occupation per unit and 256 units per hectare here, almost 2000 people would be living here. This will add significant demand.
- AON responded that there is existing infrastructure here, cannot compare the docklands with this site. Cannot ignore black ash park and ride, and the Tramore valley park.
- GJ advised that CCC would expect a social infrastructure audit of the area. Suggest look at deficits in the area as well. AIRO have carried out a socio-economic assessment of all areas. Would be worth looking at this.
- GJ concluded the point by stating that in consultation with colleagues CCC consider that the density is too high. Layout does not lend itself to character areas. A mix is required, not just to lower density but provide a more meaningful neighbourhood strategy to the site. It will benefit the layout and demands on the site for the people living there.
- CCC understand the justification the applicants have made but also have a responsibility to set this out.

Transport

- Brian O'Flynn commented that the width of footpath on Kinsale Road should be 3m not 2m.
- The link across to the valley park is key to provide amenity value. NTA are looking at funding this. (This year's funding doesn't allow appointment of design team). CCC do have options on links. This will either be a bridge, or an underground connection through culvert on river. Hope to have funding in the next year.
- Phasing of this and the bus connects (which is progressing) will be important. Linkages need to be in place, all planned but not there at the moment.
- James Duggan- Commitment on client side to meet again to meet and work with CCC on timeframes and phasing.

Heights.

- GJ confirmed that the expectation here that we will have buildings of height, higher than the prevailing built area. Have noted the statement of consistency. North eastern corner of

site is the appropriate location of the tallest element of the scheme. CCC is not going to suggest any limitation on heights for the remainder of scheme but do suggested a hierarchy of height for remainder of scheme.

- GJ suggest looking at entire area as justification for heights, appropriateness of scale.
- Note that the existing and permitted tall buildings are included in the in views assessment document. Would be important to have cumulative impact of other existing and p[ermitted tall building on this site on those views in the EIAR.
- Also a sun path assessment should be prepared, impact on quality and useability of the internal and external spaces. Crucial when proposing buildings of height. Shadow analysis and daylight supply is key.

Traffic

- Cathy Beecher welcomed upgrade of junction. Echoed what BOS said about linkages. Think the parking ratio at the moment is too low for this location. Acknowledge Black Ash park&ride and bus connects but still too low.
- This is a congested area. Would expect ratio of 0.7-0.8 or even 1 for this location. 0.3 as proposed which is one of the lowest we have seen. Crucial to improve pedestrian connectivity at this location.

Viability

- GJ asked if viability had been considered. There is some evidence of a rush towards high density and apartment builds where viability becomes an issue. Providing more of a mix can reduce viability concerns. A more diverse offer may not be as expensive to build out and can ensure deliverability of the site.
- AON confirmed that they have had input from Savills for this reason. These concerns have been incorporated into the proposed scheme.
- GJ BtR has been permitted around the city and to date none delivered. Expectation is for this tenure to come forward but seems to be a problem.
- AON commented that usually it is the smaller sites that struggle in this regard.
- Tony Duggan gave the example of the St Kevin's scheme, included various typologies. Could improve viability.
- Sean Kearns commented that these sites are not comparable. Lots of constraints on St Kevin's including site topography. This site is unimpeded by the problems St Kevin had. This is a golden opportunity to deliver high density. Future of the city to achieve the population growth we are mandated to achieve. Lower density here would be a missed opportunity. This is for a community. Only two blocks will be PRS.

Niall Sheehan - this will be a significant employer between the PCC and ancillary offices and uses. Density is in response to the Council that this site has a lot of potential.

GJ - high density development is appropriate at this location. Political support for the change of land use here. It is a significant jump in built form from 125 units per hectare to 256 units per hectare. There is somewhere in the middle. Not suggesting terraced housing, but some diversity. Up to design team as to how this advice is taken. CCC are available and open to further discussion. Tony Reddy - Ideally want to go to ABP with CCC support

Meeting concluded at 12.40pm

ATTENDEE	DATE
<p><u>Attendees</u> Niall Sheehan (Dairygold - applicant) Christine Kelleher (Dairygold - applicant) Tony Reddy (Reddy Architecture) Sean Kearns (Reddy Architecture) Paul Duggen (Reddy Architecture) Aiden O' Neill (Coakley O'Neill) Naomi Dowds (Coakley O'Neill) James Duggan (Arup) Simon Van Jaarsveld (Arup) Stephen Ginn (Arup) Daniel Garvey (Arup) Jim Kelly (Cunnane Stratton Reynolds) Gwen Jordan (Cork City Council) Brian O'Flynn (Cork City Council) Valerie Fenton (Cork City Council) Cathy Beecher (Cork City Council) Alison O'Rourke (Cork City Council) Tony Duggan (Cork City Council) Gillian Tyrrell (Cork City Council)</p>	<p>21/04/2021</p>
<p><i>The applicant is advised in accordance with Section 247 (3) of the Planning and Development Act 2000 (as amended), that "the carrying out of any consultations shall not prejudice the performance by a Planning Authority of any other of its functions under this Act, or any regulations made under this Act & cannot be relied upon in the formal planning process or in legal proceedings".</i></p>	

Appendix B: Cork City Council Second S.247 Pre-Application Consultation feedback via email, 02/07/2021

Planning Authority's Comment on the June 2021 revision to the Creamfields SHD proposal.

The revised proposal has been internally reviewed by Gwen Jordan McGee, SEP, Tony Duggan, City Architect and discussed with Fiona Redmond, Senior Planner. The following is advised having regard to the two previous meetings held with the Planning Authority on 01/09/2020 and most recent S. 247 pre planning meeting on 21/04/2021:

- The introduction of 44 townhouses and a reduction from 753 to 727 residential units are noted. The elevation and floor plan changes for Blocks A, J and K are noted.
- The Planning Authority has consistently raised the objectives relating to distinctive placemaking, community building and a neighbourhood strategy for this proposal. Concerned were raised relating to the block layout, lack of diversity for both building heights and dwelling typologies within the scheme and the clear visual definition and distinction of the character areas.
- It is considered that the proposed changes as presented in the revision of June 2021 do not significantly address the issues raised by the Planning Authority.
- While the own door units are welcome in the southern section of the layout, the overall unit mix and diversity has not been delivered. The aforementioned townhouses are positive with their own door access and duplex layout but overall, these changes would not go far enough to address the concerns raised by the Planning Authority. The townhouses remain within the built form of an apartment block and would not result in any meaningful variety of building type, as sought by the Planning Authority in pre planning discussions.
- The Planning Authority has consistently advised that the proposed density is too high as it inhibits the overall quality of the layout, public realm and living environment for the future occupants of the scheme.
- It is noted that this site was subject to a rezoning (Variation No. 6, adopted in 2019) from "Light Industrial" to "Residential, Local Services, and Institutional Uses" with an expected yield of approx. 400 units and the Primary Care Centre. While the applicant would not be bound to this housing figure, or the density guide for this area in the draft CDP will be 40-100 dph, the Planning Authority can look at a higher density than this guide, but the quality of the scheme must deliver on all the points raised above.
- The current proposed density is 247 dph, which, would inhibit the delivery of a variety of building and height housing mix on the scheme which would add significantly to the overall quality and desirability of this residential development. It is strongly advised that if the overall proposal was amended to a more diverse layout with the provisions of houses/duplexes and other house typologies within the scheme, along with apartments, it would introduce a much needed variety to the scheme, in terms of layout, built form and housing mix. Private gardens and more localised communal amenity spaces which are defensible from the public areas would address many of the Planning Authority's concerns. There are concerns that the transitional area from the town plaza down into the more private communal amenity zones are not adequate in terms of size and layout to serve the proposed quantum of the intended residents within the scheme. There is a concern about the open nature of the layout, where a more defensible space should be provided.

- While we are all in agreement that the site is a major opportunity for redefining this area, its success will depend on the objectives as outlined above. The size of the site can provide a variety of building height and typologies as you move through the site. At present, the layout, lack of variety of building height and mix of residential units is of significant concern.
- This proposal has progressed since Sept 2020. The revisions, although moving in the right direction, would not go far enough to address the Planning Authority's concerns. The proposal, as it is currently proposed would be an overdevelopment of the site and would set an undesirable precedent for this area.

We note your client's intention to submit a pre-application proposal with An Bord Pleanala over the summer. It is a matter for your client to consider this feedback and can be discussed again with the Planning Authority, prior to any Pre App submission with the Board.

Comhairle Cathrach Chorcaí

Cork City Council



Roinn Ailtire na Cathrach,
Halla na Cathrach,
Corcaigh.

City Architect's Department,
City Hall,
Cork.

Fón/Telephone: 021-4924335
Líonra/Website: www.corkcity.ie
R-Phost/E-mail: city_architect@corkcity.ie

Ref: TD/ML

2nd July 2021

Fiona Redmond
Senior Planner
Community, Culture & Placemaking

Re: Creamfields Site Planning Application -June 2021


Appraisal:

Over the last year this proposal has evolved from:

- urban slab apartment blocks fronting both Kinsale Road and a proposed access route facing warehouse distribution centre, on a podium with under-croft car-parking and a linear public open space internally between the apartment slab blocks, to
- four urban blocks, with either vehicular routes – street or pedestrian, between them and internal public open spaces and surface car-parking particularly on the route adjacent to the existing warehouse.

This revised urban design approach has greatly improved the overall concept of the scheme, however, the linear public open space still remains and consequently a lack of definition between private open space, semi-public space and public space, leads to a lack of passive supervision and potential anti-social behaviour.

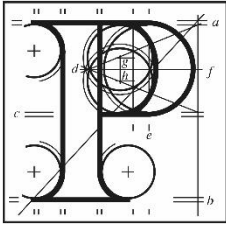
I welcome the various character areas and would consider this concept could be developed further, in a hierarchy from Town Space, Court Garden & Community Amenity Hub, to more private garden and 'urban block' based communal/community space. The former two proposed public space – community space seems to function, the latter public/communal spaces would function more satisfactorily if they were enclosed. Such an approach could include traditional town houses, mews development and would give great variety of housing typology and tenure.


Tony Duggan,
City Architect.

C.C. Gwen Jordan, Senior Executive Planner.

\\CJ. GENERAL OFFICE ADMIN\PLANNING\Planning Reports\Tramore Rd Creamfields\2021-07-02 CA Report.docx

Appendix C: An Bord Pleanála minutes of Section 247 Pre-Application Consultation held on 07/10/2021



Case Reference / Description	706 no. apartments, childcare facility and associated site works. Former CMP Dairy Site and Creamfields, Tramore Road and Kinsale Road, Co. Cork.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	7 th October 2021	Start Time	2:30 pm
Location	Remotely via Microsoft Teams	End Time	4:20 pm
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Fiona Fair, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Prospective Applicant:

Niall Sheehan, Applicant
Tony Reddy, Reddy Architecture and Urbanism
Paul Mulligan, Reddy Architecture and Urbanism
Stephen Ginn, ARUP
Jim Kelly, Cunnane Stratton Reynolds Land Planning and Design
Aiden O'Neill, Coakley O'Neill Town Planning Ltd

Representing Planning Authority

Mary Doyle, Executive Planner
Gillian O'Sullivan, Senior Executive Engineer
Simon Lyons, Senior Executive Engineer
Gwen Jordan, Senior Executive Planner

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the PA on 14th September 2021 providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000, as amended and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 18th August 2021 formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, as amended, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

1. Compliance with CDP Policy
 - Integration with the wider area
 - Density / Plot Ratio
 - Height Strategy & Visual Impact
 - Housing Typology / BTR
2. Issue of Primary Care Centre
3. Infrastructure services (Surface Water, Flooding, Irish Water, Transportation & Connectivity).
4. Residential Amenity
 - Daylight and Overshadowing
 - Outdoor Amenity Space
 - Resident support services & facilities
5. Open Space and Landscaping
6. Issues Raised in the CE Report

7. Any Other Matters

1. **Compliance with CDP Policy**

- **Integration with the wider area**
- **Density / Plot Ratio**
- **Height Strategy & Visual Impact**
- **Housing Typology / BTR**

• **ABP Comments:**

- The prospective applicant is to address the urban form.
- Demonstrate at application stage that the proposed density is appropriate.
- Respond to the PA's requests and requirements.
- Build to Rent can be useful in initially integrating people into an area.
- Provide a housing needs assessment at application stage.
- Elaboration and clarification in relation to the Cork City Development Plan review and current status of the Draft Cork City Development Plan 2022 - 2028.
- Consideration of the draft development plan timelines. Should a new draft plan be adopted while any application is under consideration by the Board it would be subject to compliance with the new plan.
- There is a need to focus in on areas of concern.

• **Prospective Applicant's Comments:**

- Variation No. 6 contributes to the regeneration of the city. Aims to increase housing within the city.
- The proposal will act as a catalyst for regeneration of the Tramore Road area.
- The proposed development site benefits from existing site connections.
- The proposed development can be a catalyst for the regeneration of the Tramore Road area.
- There has been good interaction with the PA and this has enabled the evolution of the development.
- The site is set back from the Kinsale Road to allow for a cycleway and pedestrian path.
- There is permeability throughout the proposed development.
- The scheme has a wide variety of units.
- The prospective applicant is committed to providing a high-quality scheme, a vision for the wider area.

• **Planning Authority's Comments:**

- The proposed development has the capability of informing the future development of the area.
- Welcome development of this brownfield site.
- Has concerns in relation to the density and layout. These concerns are the same as those raised at Stage 1.
- The PA still has concerns in relation to the density and the implications on placemaking in terms of integration into the area.
- Acknowledge that a density of higher than that set out in Variation 6 may be appropriate but mindful that this site is a catalyst for the wider area.
- Potential occupancy of 2000 people concern with respect to density and layout.

- The planning authority are happy with the plaza and the layout of the northern portion of the site.
- Townhouses are required to create a sense of community.
- The PA is supportive of a high feature building at the corner of the proposed development.
- The prospective applicant is to have consideration of the integration of the proposed development into the existing environment.
- Applicant should respond to the specific requirements of the planning authority, regarding urban form, vision for the area, accepting of 7 storey height.
- Acknowledge that Variation is flexible and allows for a landmark building. However the environment is challenging, suburban location, connectivity issues to parks and public transport.
- The environment is quite challenging in terms of connectivity.
- The draft city development plan is of relevance in terms of the area's building height and design.
- More diversity of units and a variety of typologies is required.
- The 2-storey town houses are a welcome addition to the proposed development.
- There is concern over the viability of Build to Rent schemes. Transient nature of occupants.
- The key objective is placemaking and community in this area and to create an urban culture in place of a suburban culture.

2. Issue of Primary Care Centre

- **ABP Comments:**

- The prospective applicant is to provide further information on the under-croft carpark and how the car parking associated with the primary care centre is to be managed.
- Explanation why the primary care centre does not form part of the proposed development.

- **Prospective Applicant's Comments:**

- The primary care centre (4,500 sq. m) will form part of the overall masterplan.
- The applicant proposes to lodge concurrently an application for the primary care centre to the planning authority.
- There is an issue with commercial GFA limit for SHD process.
- The prospective applicant remains committed to the delivery of the primary care centre.
- The carparking for the primary care centre will be included within the blue line of the SHD application.
- The HSE will be consulted in relation to their own parking requirements.

- **Planning Authority's Comments:**

- The proposed development is instrumental and its location and design forms part of the plaza area.
- Do want to see the primary care centre realised, are committed to it. The draft CDP welcomes it.

- Preference that it form part of the SHD application.
 - Cognisance to be had to excess floor area, height, density and its inclusion within the SHD application.
- 3. Infrastructure services (Surface Water, Flooding, Irish Water, Transportation & Connectivity).**
- **ABP Comments:**
 - The prospective applicant is to address the concerns raised in relation to connectivity of the proposed development to the footpath and cycle lane network.
 - Address the 15-minute proximity to the bus stop.
 - Irish Water have raised an issue with respect to connection of wastewater.
 - Address the issues raised in Irish Water's report.
 - Have consideration for any issues in relation to the EIAR.
 - Consistency across all documentation and drawings is critical in any future application.
- **Prospective Applicant's Comments:**
 - The proposed development is close to the Park and Ride.
 - The proposed development site is permeable from all sides.
 - There is an opportunity for an interim bus stop near the proposed development while waiting for the Bus Connects.
 - There is minimal flood risk.
 - Will be seeking further consultations with Irish Water and the PA.
 - The proposal will be for a 10 year permission. Currently linkages are poor but over time connections will arise. Willing to work with CCC Bus Connects is a priority measure.
 - Trip generation and numbers are not high and junctions will not be a problem.
 - Opportunity to have access from Kinsale road.
 - A special contribution towards footpath and cycle connections is envisaged.
 - The applicant is currently in discussion with Irish Water regarding wastewater infrastructure, need for a pumping station, its location and odour.
 - The applicant is willing to enter into further discussions with Irish Water and the planning authority in respect of infrastructure.
 - Potential for flooding is minimal.
 - The statement of design will address issues of wastewater, surface water and storm water.
- **Planning Authority's Comments:**
 - There is a need to address the land ownership issue regarding the pedestrian footpath link to the Black Ash Park and Ride.
 - There is currently no access to the Tramore Valley Park.
 - Over reliance on future connections, while Bus Connects is a live project and a priority measure, cant rely on it.
 - The project is welcome and the planning authority will try to accommodate the development. Aware of constraints and ownership issues.
 - It is acknowledged that deliverability of the project will take time.

- Acknowledge that Bus Connects relies upon density along the route to work.
- All options will be considered but can not commit to fast tracking of Bus Connects.

4. Residential Amenity

- Daylight and Overshadowing
- Outdoor Amenity Space
- Resident support services & facilities

- **ABP Comments:**

- The prospective applicant is to provide a comprehensive daylight and sunlight report at application stage. State the impact and provide the rationale. Access worst case scenario, explanation of how the assessment has been carried out and rationale for chosen design, acknowledge non compliance and mitigation proposed.
- Provide a shadow assessment of the outdoor amenity space.
- Ensure that the proposed development is not unduly prejudicing the lands on the adjoining site.

- **Prospective Applicant's Comments:**

- The scheme performs well in relation to daylight and sunlight. 70 – 80% compliance with BRE standards. Hoping to achieve greater compliance at application stage.
- The prospective applicant has consulted with the adjoining landowners.
- The EIAR and all report will take account of impact to adjoining lands.

- **Planning Authority's Comments:**

- A comprehensive report is required in terms of overshadowing.
- The PA welcomes as many facilities as possible, with a preference for a diverse range of facilities.
- There are no facilities towards the southern end of the proposed development site.
- The defined town centre / Plaza area is good.
- Have consideration for play areas for teenagers and outdoor spaces for wheelchair users. Need to cater for young, elderly, singles and families.
- Justification of permeability and open space layout proposed through the scheme.

5. Open Space and Landscaping

- **ABP Comments:**

- The prospective applicant is to address the PA's concerns in relation to open space and landscaping.
- Cognisance is had to the nature of the proposed development in terms of open space design and policing. The management of open space would be by way of a management company, anti-social behaviour would be policed.

- **Prospective Applicant's Comments:**

- The meadows have surveillance and that gives them a sense of security.

- There is a conflict in providing secure communal open space, being permeable and opening up the site. Trying to make the design police itself. Use of passive surveillance, quieter to the south, facilities to the north.
- The proposed development has defensible spaces in front of the units.
- All the public spaces are overlooked.
- The prospective applicant is committed to the maintenance and management of the open spaces, including CCTV.
- **Planning Authority's Comments:**
- The PA is seeking a diverse range of typologies, which could improve the layout in terms of defensible, communal, open space.
- Concern with respect to possible anti-social behaviour encouraged by back gardens opening onto public open space.

6. Issues Raised in the CE Report.

- **ABP Comments:**
- Address issues in relation to the pumping station.
- Address all issues raised in the transportation department report.
- Need for a Road Safety Audit.
- **Prospective Applicant's Comments:**
- Will take ABP comments and PA comments into consideration.
- **Planning Authority's Comments:**
- The PA can facilitate further discussions in relation to the traffic and transport assessment.

7. Any other matters

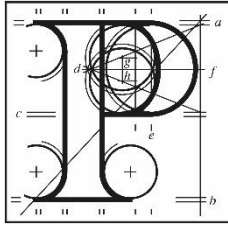
- **ABP Comments:**
- Ensure that there are no discrepancies in the application documentation.
- Have consideration for the EIAR, recent high court judgements and any Material Contraventions.
- There is a need to submit every possible piece of information, justify all aspects of the proposal. Have cognisance to and address the concerns raised by the competent planning authority. In particular with respect to the height of the proposal on the southern portion of the site.
- Have consideration for the Tramore River, located 80 metres south of the proposed development.
- **Prospective Applicant's Comments:**
- No further comments.
- **Planning Authority's Comments:**
- No further comments.

Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published.
- A Schedule of Documents and Drawings should be submitted with the Application.
- Sample notices, application form and procedures are available on the ABP website.
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie.

Tom Rabbette
Director of Planning
December, 2021



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing) and
Residential Tenancies Act 2016**

**Inspector's Report on
Recommended Opinion
311166-21**

Strategic Housing Development

706 no. residential dwellings (656 no. apartments and 50 no. townhouse apartments, childcare facility and associated site works).

Location

The former CMP Dairy site (known as Creamfields) on Tramore Road/Kinsale Road, Cork.

Planning Authority

Cork City Council.

Prospective Applicant

Watfore Ltd.

Date of Consultation Meeting

7th October 2021

Date of Site Inspection

16th September 2021

Inspector

F. Fair

1.0 Introduction

- 1.1.1. Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority and the documentation received from the prospective applicant, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1.1. The site of the proposed strategic housing development is c. 2.94ha in area and is bounded to the north by Tramore Road (and faced by the Independent Park sports complex), to the east by Kinsale Road – a generous urban highway that forms a vital connection between the city and South Cork – and to the south and west by a convenience retail store and two large warehousing logistics complexes belonging to the Musgrave Group and Allied Foods. The northern section (60%) of the site is flat, while the southern section gently slopes away towards Tramore River, which is located further to the south of the adjacent convenience retail store. The T-junction formed by Kinsale Road and Mick Barry Road along the eastern boundary of the site corresponds with the contour line that results in the change in gradient on the subject site itself.
- 2.1.2. The current condition of the site can be described as typical brownfield. It is predominantly characterised by hardstanding, which includes the remnants of building foundations, as well as rubble, gravel, shrubbery, semi-mature and some mature trees and mature hedging growing along the boundaries of the site. An overhead 110kV electricity power line traverses the southern section of the site in a south-westerly/north-easterly direction. The current boundary treatment along Kinsale Road and Tramore Road is Guardsman security fencing on top of a single

block-high capped wall, with palisade fencing along the site boundary with Musgraves. Between 1995 and 2006 the site was occupied by creamery buildings associated with the operations of Cork Milk Producers (CMP). In 2006 all buildings on site were demolished. Since then, the site has been an unoccupied brownfield site, with no other use than as the seasonal location for a temporary fun fair (Funderland).

2.1.3. The site is within 500m of the Kinsale Road Roundabout which is the junction between the South Link Road (N27) – a dual carriageway which serves as a main arterial route, channelling significant volumes of traffic to/from and through Cork City Centre – and the South Ring Road (N40), which marks the southern boundary between the inner and outer southern suburbs of Cork City.

2.1.4. The wider surrounding site context is characterised by a large variety and mixture of footprints, from established residential suburban housing to box retail, sports and recreational open space, warehousing, and public transport facilities. The urban grain of the box retail, as well as the Black Ash Park and Ride public transport facility which connects the area by bus with the City Centre, and warehousing units, which lie to the east and south of the site can be described as monolithic buildings surrounded by large surface car parks and other underutilised land. The movement between these zones/buildings is predominantly by car, which leads to little or no pedestrian movement or civic engagement. In contrast to this, the three residential areas to the north-west and north-east – Ballyphehane, Turner's Cross and the South Douglas Road – are long-established suburban neighbourhoods dating from the early and mid-twentieth century, where the open space and civic and communal buildings create and support a high degree of pedestrian permeability and sense of community. To the north-west and north-east of the site lie two residential areas – Ballyphehane and South Douglas Road. To the south lies the residential area of Park Gate, as well as the industrial and business area of Togher. Immediately north of the site lies Independent Park rugby football stadium primarily used by two local rugby clubs and Munster Rugby. Further to the north is Turner's Cross(Cork City FC)

soccer stadium. Tramore Valley Park, a large recently opened regional public park within the Cork Metropolitan area, is located further east of the site.

3.0 Proposed Strategic Housing Development

3.1.1. The proposed development consists of a residential development consisting of:

- The construction of 706 no. residential dwellings (656no. apartments and 50no. townhouse apartments, to include 240no. 1-bed dwellings; 383no. 2-bed dwellings; 72no. 3-bed dwellings; and 11no. 4-bed dwellings) and ancillary facilities arranged in 9no. buildings (Buildings A, B, C, E, F, G, H, J and K) varying in height from 3 to 15 floors

3.1.2. The following development parameters are noted: **Table 1**

Parameter	Site Proposal
Site area	2.94 hectares
No. of Units	706 no. dwellings <ul style="list-style-type: none"> - 656 no. Apartments (93%) - 50 no. Townhouses (7%)
No. of Build to Rent Apartments	Of the 656no. apartments, 238no. are Build To Rent apartments. All BTR apartments are located in Block E and Block F (70no. 1 bed; 133no. 2 bed; and 35no. 3 bed)
Non Residential Uses (Blocks E and F also include commercial and community facilities at ground level)	<ul style="list-style-type: none"> - A 289m2 crèche with ancillary outdoor play area (63 no. child spaces). - A 647m2 community hub facility. - A 550m2 gym. - A 218m2 retail unit. - A 272m2 café, cinema/media room, and co-working lounge/business centre.

	- A single storey, 100m2 coffee kiosk
Resident Services and Amenities	<ul style="list-style-type: none"> • Bike Store 01 Block F 180m2 • Bike Store 02 Block F 51m2 • Refuse Store 01 Block F 48m2 • Refuse Store 02 Block F 43m2 • Community Building Block F 506.5m2 , with Reception (17m2); WC Facilities (40m2) Community Lounge/Town Hall Events room (329m2); Co-Working Lounge/Business Centre (78m2); and Cinema/Media Presentation Room (83.5m2)
Resident External Amenity Space	<p>9,305m2 (31.6%) public and semi-public open space, to include:</p> <p>Town Square: 3,025m2</p> <p>Garden Court; 1,650m2</p> <p>Meadow 01: 1,950m2</p> <p>Meadow 02: 1,840m2</p> <p>Roof Terraces: 598m2</p> <p>Creche Garden: 242m2</p>
Density	240 units / ha
Height	3 - 15 Storey
Plot Ratio	2.4:1
Site Coverage	29%
Dual Aspect Apartments	65% of residential units (458no.) benefit from dual aspect.
Private Open Space	All of residential units have individual private open space in accordance with the standards set out in the Apartment Guidelines, 2020

Car Parking Total	217no. spaces (147no. basement spaces and 70no. surface spaces)
Bicycle Parking	1,242no. bicycle parking spaces, equating to 1no. cycle space per bedroom (provided within 9 dedicated external and internal cycle stores).
Vehicular Access	1 no. new primary access off Kinsale Road at the junction with Mick Barry Road, upgrades to that junction, an upgrade to the existing access from Tramore Road, and internal roads through the site, as well as pedestrian access points, shared surfaces, pedestrian walkways and cycle paths throughout the site.
Part V	71no. units, to include 27no. 1 bed units; 37no. 2 bed units and 7no. 3 bed units

Table 2: Unit Mix

Unit Mix	No. of units	%
Apartments	656	93
Town house apartments	50	7
1 bed	240	34
2 bed	383	54
3 bed	72	10
4 bed	11	2
Total	706	100

3.1.3. The proposal is presented in 9 blocks: **Table 3**

Block	Height (over ground)	Units	Apartments	Townhouses
A	7	94	79	15
B	6	90	90	-
C	7	103	103	-
K	8	81	69	12
J	6	82	68	14
G	2	10	5	5
H	2	8	4	4
E (Build to Rent)	6 to 15	115	115	-
F (Build to Rent)	4 to 8	123	123	-
Total	2 to 15 storeys over ground (generally 1 storey basement with each block)	706	656 (93% of scheme)	50 (7%)

4.0 National and Local Planning Policy

4.1.1. National

Project Ireland 2040 - National Planning Framework

Chapter 4 of the Framework addresses the issue of ‘making stronger urban places’ and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 4 sets out to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

The directly relevant National Policy Objectives as contained within the NPF include: National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3b: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 11: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables

alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected. National Policy

Objective 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 57 sets out to enhance water quality and resource management, this includes the requirement to ensure that flood risk management informs place making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. Relevant Section 28 Ministerial Guidelines:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual')
- Design Manual for Urban Roads and Streets (Interim Advice Note Covid -19, May 2020)
- Guidelines for Planning Authorities on Urban Development and Building Heights, 2018
- Sustainable Urban Housing: Design Standards for New Apartments (2018),
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities (2009).
- The Architectural Heritage Protection Guidelines for Planning Authorities (2011).

4.1.2. **Regional Policy**

Southern Regional Spatial and Economic Strategy (2020)

- 4.1.3. The Southern Regional Assembly was responsible for creating the Regional Spatial and Economic Strategy (RSES) for the Southern Region, which came into effect on 31st January 2020. Included in the RSES for the Southern Region is the Cork Metropolitan Area Spatial Strategy (MASP).
- 4.1.4. Regional Planning Objectives (RPO) 6-10 of the RSES relate to the MASPs for each of the three metropolitan areas of the Southern region – Cork, Limerick-Shannon and Waterford.
- 4.1.5. RPO 6 is of note in relation to the proposed development in that it is aimed at collaboration between the three metropolitan areas to support the strategic objectives and population targets of the NPF and for focused and long term investment in these areas as economic engines to ensure regional parity.

RPO 6 concludes that: The three metropolitan areas will lead together in partnership to harness their combined potential as viable alternatives to the unbalanced growth of Dublin. National and regional policy have assigned a heretofore unprecedented scale and rate of growth for Cork City in order to assist in counterbalancing the excessive growth and sprawl of Dublin.

4.1.6. Local Policy

Cork Metropolitan Area Spatial Plan

- 4.1.7. The Cork MASP has been prepared by the Southern Regional Assembly and aligns with current national planning policy and objectives, including those contained in the NPF. The proposed development supports the following strategic goals of the Cork MASP:

- Goal 1: Sustainable Place Framework
- Goal 2: Excellent Connectivity and Sustainable Mobility
- Goal 4: High Quality Environment and Quality of Life

The Cork MASP specifically identifies Tramore Road as being an “Example Regeneration Area” within Cork city. A core aim of the Cork MASP is for Cork city’s suburbs to be compact – the density of the proposed development will fully support this objective for the southern suburbs of Cork city. The Cork MASP contains population growth targets for 2031 that are consistent with those in the NPF that are set for 2040. According to section 5 of the Cork MASP, Cork City and Suburbs are to grow by 75,000 by the year 2031, with a target population of 283,669 for that year. According to the CSO, the current average household size in Ireland is 2.75 (Census of Population 2016 - Profile 4 Households and Families). Applying this figure to the 2031 population growth target for Cork City, an additional approximately 27,270 homes will need to be provided in the city by that year. Furthermore, if the realisation of that target number of additional homes is to be consistent with National Policy Objective 3b of the NPF, then at least 13,635 new homes will need to be developed within Cork City and Suburbs within the next decade. This goal requires delivery of residential development in Cork City on an unprecedented scale. The proposed development can be considered as a direct response to this new paradigm for Cork City in that, if granted permission, it would account for the provision of just over 5% of that target.

Cork MASP Policy Objective 2 seeks the delivery of 11 key points. The proposed development will contribute to the delivery of 5 of these key points. These 5 key points are:

- c. Seek investment to achieve regeneration and consolidation in the city suburbs and high quality architectural and urban design responses to enhance the uses of this waterfront and all urban quarters.
- f. Seek to achieve High Quality Design to reflect a high-quality architectural building stock in all urban quarters.
- g. Seek delivery of a network of large city parks and smaller green areas throughout the metropolitan area and inner-city areas.
- h. Strengthen Social and Community Development

i. Support active regeneration initiatives that are ongoing, especially driven through the Local Economic Community Plan, Local Community Development Committee and RAPID initiatives.

The subject site is located within 1 i.e. Togher/Mahon/Ballyphehane, of the 4 areas of Cork City previously identified by Cork City Council as being disadvantaged and requiring intervention through the Revitalising Areas through Planning, Investment and Development (RAPID) initiative.

5.0 Planning History

Application Register Reference 17/37528: Permission was applied for on the 11th of August 2017 in respect of a retail warehousing/retail showrooms/medical services development. The application was subsequently withdrawn on the 5th of October 2017.

Application Register Reference 06/30717: Permission was granted on the 22nd of September 2006 for the demolition and removal of existing buildings, the diversion of the municipal sewer around the site, and the carrying out of ground remediation works.

Application Register Reference PL28.206292 (03/27881): Outline permission was granted on the 30th of August 2004, after a first party appeal, for a 4-storey office building with a total floorspace area of 5000m² and associated car park on the southern 1.55Ha portion of the site.

Relevant Planning History in the Vicinity of the Site

The vicinity of the site is defined to the east by the South Link Road, to the north by the Tory Top Road neighbourhood district centre, to the west by the roundabout junction between Tramore Road and Pouladuff Road, and to the south by the South Ring Road. Ballyphehane Gaelscoil (approx. 570m north-west of the subject site)

Application Register Reference 20/39396: Permission was granted for the retention of 3 no. single storey temporary classroom units and toilets. Coláiste Stiofáin Naofa (approx. 900m west of the subject site)

Application Register Reference 20/39252: Permission was granted for the provision of temporary primary school accommodation by way of construction of a pre-fabricated buildings (c.275m²) with associated site works including relocation of displaced car parking spaces as a result of proposed development, boundary treatments, bicycle parking etc. 226/228, Connolly Road (approx. 600m west of the subject site)

Application Register Reference 21/39879: Permission for the retention of modifications to the previously approved development under PP Ref: 18/37823 was granted on the 7th May 2021. The modifications include: (1) The installation of 16.0sq/m of roof mounted photo voltaic solar panels on each dwelling. (2) The provision of disability access ramps to the front elevation of both dwellings. (3) The omission of 1 no. window at ground floor level on the northern elevation of house no. 226 and the western elevation of house no. 228. (4) The repositioning of approved patio door on the southern elevation of house no. 228.

Application Register Reference 18/37823: Permission was granted for the change of use from a bicycle and pram shop to residential use (2 No. Dwelling houses), including the demolition of side and rear extensions (single-storey), and the construction of a two-storey side extension to the east and west elevations. Changes to the front elevations included the removal of shop fronts and replacement with domestic windows and doors. Off road parking for each dwelling house was permitted.

6.0 **Section 247 Consultation(s) with Planning Authority**

It is stated by the prospective applicant a Section 247 pre-planning meetings took place with Cork City Council (CCC) on the 21st April 2021. The minutes of the meeting are attached to the file.

7.0 Submissions Received

Irish Water (report dated 20th September 2021)

Irish Water has confirmed that a Confirmation of Feasibility has been issued to the applicant advising that connection(s) are feasible subject to the following:

In respect of Wastewater:

Irish Water records indicate that there is existing infrastructure present on the proposed development site. Irish Water does not permit build over of its assets, therefore, the applicant is required to engage with Irish Water Diversions section in respect of a feasibility assessment of the proposal and any requirements for a diversion(s) of the existing asset(s) and/or to agree the required separation distances associated with the infrastructure and to demonstrate that the proposed SHD structures and works will not inhibit access for maintenance or endanger structural or functional integrity of the public infrastructure during and after the works.

IW respectfully request ABP to notify the applicants of the requirement to submit designs and layouts to diversions for feasibility assessment and have agreement in place with IW as to diversion and/or separation distance requirements prior to progressing to SHD application. In addition to above, in order to accommodate the connection, point a portion of the site, as proposed, will require the construction a Pumping Station, which the applicant is proposing to deliver within the development site.

The Pumping Station shall be constructed such that it can serve the area to the south of the development. The design of the pumping station shall be agreed with Irish Water as part of any connection agreement.

In respect of Water:

A connection can be made to the watermain on the Kinsale Road..

8.0 Forming of Opinion

Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide brief detail on each of these elements hereunder.

9.0 Documentation Submitted

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia,

- Planning Report & Statement of Consistency
- Social and Community Audit
- Childcare Needs Assessment
- Architectural Design Statement Incl. Housing Quality Assessment
- Construction and Demolition Resource Management Plan
- Daylight and Sunlight Preliminary Assessment
- Construction Environmental Management Plan
- Traffic & Transport Assessment & Mobility Management Plan
- Wind Microclimate Study
- Landscape Design Rationale
- Outdoor Lighting Report
- Energy Statement
- Planning Support Report

- Property Management Planning Submission
- Build To Rent Covenant
- Part V Costings
- Mechanical and Electrical Basis of Design Report

I have considered all of the documentation submitted by the prospective applicant, relating to this case.

10.0 Planning Authority Submission

In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, cork City Council, submitted copies of their section 247 consultation with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on the 14th September 2021.

The Planning Authority has identified a number of considerations which may have a bearing on the Board's decision as to whether the proposal constitutes a reasonable basis for an application.

- Justification from the applicant why the Primary Care Centre isn't part of this SHD application.
- Layout, lack of variety of building height and mix of residential units is of significant concern.
- The 15-storey block proposes an overall height of 48m (59m O.D). The proposal is not in accordance with the City Development Plan in terms of specified locations for such buildings.
- The height strategy and residential dwellings typologies particularly for Blocks A, B, J & K should be confined to four storeys and display a variety of dwelling typologies, 3 to 4 storey town house and duplex typologies should be examined.

- A key issue at this location is the existing environment and specifically how the transition occurs.
- The appropriateness of the location for BTR (34%) is questioned.
- Noise Impact Assessment for future residents – cash and carry use adjoining.
- A more detailed Sunlight / Daylight / Overshadowing report is required.
- Concern of quantum and layout of open space
- Very little variation presented in the design.
- A landmark building might be considered at the NE corner of the site provided it is designed in such a way to stand out and be of particular architectural quality.
- Need to contact the Department of Education with regard to their plans to deliver new primary and post-primary schools at this location and the estimated timeframe for same.

I have reviewed and considered all of the documentation submitted by the planning authority relating to this case.

11.0 Consultation Meeting

A Section 5 Consultation meeting took place via Microsoft Teams on the 7th October 2021, commencing at 02.30 am. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

The main topics raised for discussion at the tripartite meeting were as follows:

1. Compliance with CDP Policy
 - Integration with the wider area
 - Density / Plot Ratio
 - Height Strategy & Visual Impact

- Housing Typology / BTR

2. Issue of Primary Care Centre

3. Infrastructure services (Surface Water, Flooding, Irish Water, Transportation & Connectivity).

4. Residential Amenity

- Daylight and Overshadowing

- Outdoor Amenity Space

- Resident support services & facilities

5. Open Space and Landscaping

6. Issues Raised in the CE Report

7. AOB

11.1.1. In respect of compliance with County Development Plan policy, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Justification is required for integration and transition in scale of the urban form of development, cognisance, being had to design, presentation, community and placemaking.
- Justification that the density proposed is appropriate in light of Variation no. 6 of the Cork City Development Plan 2015 – 2021, which accepted the principle of 400 units and a primary care centre which equates to some 125 u/ha.
- Requirement at application stage for a housing needs assessment, detailed property management proposal and a Build To Rent Covenant.
- Further elaboration and clarification in relation to the Cork City Development Plan review and consideration of the draft development plan timelines (Draft Cork City Development Plan 2022 – 2028), should a new draft plan be adopted

while any application is under consideration by the Board it would be subject to compliance with the new plan.

- Further consideration and justification of areas of concern and issues raised by the planning authority.

11.1.2. In relation to the primary care centre, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further elaboration required with respect to the under-croft carpark and how the car parking associated with the primary care centre is to be managed.
- Further discussion with respect to why the primary care centre does not form part of the proposed development.

11.1.3. In relation to infrastructure services, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Further elaboration and justification with respect to the concerns raised in relation to footpath and cycle lane connectivity.
- Clarity in respect of pedestrian and cycle connectivity to the nearest bus stop and to Black Ash Park.
- There is a need to address all issues raised by Irish Water in their report, in particular with respect to requirement of a pumping station and its location on the site.
- Consistency across all documentation and drawings is critical in any future application.
- Consideration for all issues in relation to the EIAR.

11.1.4. In relation to residential amenity, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- There is a requirement to carry out a Daylight and Sunlight Assessment as part of any future application. The assessment should set out where the proposal

complies with relevant BS or BRE standards and any noncompliance or shortfall should be clearly identified, justified and mitigation measures proposed.

- Further assessment of shadow impact to outdoor amenity space.
- Justification of the quantum of outdoor amenity space proposed to serve the density of population proposed, in particular, communal open space.
- Further consideration and justification that the proposed development would not unduly prejudice adjoining lands.
- Clarity in respect of assessment and justification of quantum of resident services and amenities proposed, in particular, in light of BTR proposal.

11.1.5. In relation to open space and landscaping, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Clarification that all items raised by the PA in their report submitted to the Board are addressed, further meetings should be sought to resolve outstanding issues.
- As discussed above, further consideration that the layout, quantum and design of the open space and communal areas will serve all ages and abilities.

11.1.6. In regard to issues raised in the CE report, An Bord Pleanála sought further elaboration / discussion / consideration of the following:

- Further justification of issues raised with regard to the pumping station.
- Further clarity and response to all issues raised in the transportation department report. Need for a Road Safety Audit.

11.1.7. In regard to other matters, An Bord Pleanála sought further elaboration / discussion / consideration of the following:

- Clarity that there are no discrepancies across all of the application documentation.

- Consideration of EIAR, recent high court judgements and any Material Contraventions.
- Further consideration and response to the concerns raised by the competent planning authority.
- Consideration of the Tramore River, located 80 metres south of the proposed development, implications for AA.

12.0 Conclusion and Recommendation

- 12.1.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 12.1.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines and local policy via the statutory plans for the area.
- 12.1.3. Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment** in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 12.1.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making

process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

13.0 Recommended Opinion

13.1.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

13.1.2. Following consideration of the issues raised during the consultation process and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted **requires further consideration and amendment** to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

13.1.3. In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Delivery of pedestrian and cycle links

- (i) Clarification at application stage as to the provision of pedestrian and cycle connectivity from the development site to the closest bus stop and Black Ash Park and Ride. Any impediments to such connections should be clearly identified and proposals submitted as to how such impediments are to be overcome.

2. Development Strategy

- (i) Further justification for the height strategy, integration with the wider area and density, specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development and the proposed development cognisance being had that this development will form a catalyst for future development on surrounding lands.

13.1.4. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

13.1.5. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries. The statement should be supported by contextual plans and contiguous elevations and sections.
2. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory plan for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

3. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.
4. A Traffic and Transportation Impact Assessment.
5. Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.
6. Justification of quantum and quality of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards, provision of play spaces, hard and soft landscaping and planting details.
7. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:
 - (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.
 - (ii) A Shadow Impact Assessment of the proposed development on the wider area.
8. A response to matters raised within the PA Opinion submitted to ABP on the 14th of September 2021 in particular, section 2.9 'Building a community', in relation to quantum of resident services and amenities.

9. As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application specifically as 'Build to Rent' housing development and a covenant/legal agreement is required at application stage for BTR development.
10. A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.
11. Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 20th September 2021.
12. A response to issues raised in the Drainage Planning Report, and the Transportation Planning report undated, accompanying the PA Opinion submitted on the 14th September 2021.
13. An AA screening report, which inter alia, considers potential impacts on all of the Qualifying interests (QI's) of all Natura 2000 sites identified as being within the zone of interest.
14. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
15. Site Specific Construction and Demolition Waste Management Plan.
16. Details of public lighting.

13.1.6. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the

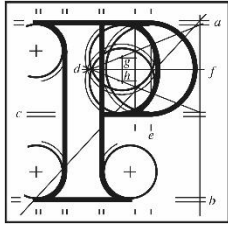
following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Irish Aviation Authority (IAA)
3. National Transport Authority (NTA)
4. Transport Infrastructure Ireland (TII)
5. The Minister for Culture, Heritage and the Gaeltacht,
6. The Heritage Council
7. Department of Education
8. An Taisce — the National Trust for Ireland
9. Cork City Childcare Committee.

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Fiona Fair
Senior Planning Inspector
27.10.2021



An
Bord
Pleanála

Case Reference:
ABP-311166-21

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 706 no. apartments, childcare facility and associated site works. Former CMP Dairy Site and Creamfields, Tramore Road and Kinsale Road, Co. Cork.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Delivery of pedestrian and cycle links

- (i) Clarification at application stage as to the provision of pedestrian and cycle connectivity from the development site to the closest bus stop and Black Ash Park and Ride. Any impediments to such connections should be clearly identified and proposals submitted as to how such impediments are to be overcome.

2. Development Strategy

- (i) Further justification for the height strategy, integration with the wider area and density, specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development and the proposed development cognisance being had that this development will form a catalyst for future development on surrounding lands.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries. The statement should be supported by contextual plans and contiguous elevations and sections.
2. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory plan for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

3. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.
4. A Traffic and Transportation Impact Assessment.
5. Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.
6. Justification of quantum and quality of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards, provision of play spaces, hard and soft landscaping and planting details.
7. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:
 - (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.
 - (ii) A Shadow Impact Assessment of the proposed development on the wider area.
8. A response to matters raised within the PA Opinion submitted to ABP on the 14th of September 2021 in particular, section 2.9 'Building a community', in relation to quantum of resident services and amenities.
9. As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application

specifically as 'Build to Rent' housing development and a covenant/legal agreement is required at application stage for BTR development.

- 10.** A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.
- 11.** Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 20th September 2021.
- 12.** A response to issues raised in the Drainage Planning Report, and the Transportation Planning report undated, accompanying the PA Opinion submitted on the 14th September 2021.
- 13.** An AA screening report, which inter alia, considers potential impacts on all of the Qualifying interests (QI's) of all Natura 2000 sites identified as being within the zone of interest.
- 14.** A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
- 15.** Site Specific Construction and Demolition Waste Management Plan.
- 16.** Details of public lighting.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- 1. Irish Water**
- 2. Irish Aviation Authority (IAA)**
- 3. National Transport Authority (NTA)**
- 4. Transport Infrastructure Ireland (TII)**
- 5. The Minister for Culture, Heritage and the Gaeltacht,**
- 6. The Heritage Council**
- 7. Department of Education**
- 8. An Taisce — the National Trust for Ireland**
- 9. Cork City Childcare Committee.**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
December, 2021